

An aerial photograph of a large industrial complex, likely a paper mill, situated in a valley surrounded by dense, lush green forest. The facility consists of several long, interconnected buildings with grey roofs, a prominent tall chimney on the left, and a large outdoor storage area on the right filled with stacks of materials. A river or stream flows through the center of the complex. The sky is clear and blue.

**ERFURT®**

# **GENERATIONAL FAIRNESS 8.0**

**Report on the 2022 sustainability performance status**

**ERFURT®**

# CONTENTS

## REPORT ON THE 2022 ERFURT SUSTAINABILITY PERFORMANCE STATUS\*

\* For reasons of improved understanding, the company name will solely be referred to as ERFURT.  
However, this report applies to both ERFURT & SOHN KG and german paper solutions GmbH & CO. KG.

### THE ERFURT BRAND AND THE COMPANY BEHIND IT

- 14 | The ERFURT brand
- 16 | Our brand range
- 18 | Our business strategy
- 22 | Quality management, research and development

### TRANSFORMATION STRATEGY

- 26 | Materiality analysis
- 28 | Transformation approach
- 30 | Company management
- 34 | Biodiversity/water and soil transformation area
- 38 | Social standards transformation area
- 42 | Material health transformation area
- 46 | Decarbonisation transformation area
- 50 | Circularity transformation area

### FRAMEWORK

- 56 | Reporting limits
- 58 | GRI Report
- 70 | GRI Content Index
  
- 76 | Contact and legal information



# GENERATIONAL ENTREPRENEURSHIP: **THE EIGHTH GENERATION OF TRADITION, VALUES AND INNOVATION.**



Our family tradition, which goes back almost two hundred years and shapes our company, is more than just a review of past successes; it provides guidance for the present and for future generations. ERFURT's innovative strength is reflected in its technological advances, as well as in its continuous adaptation to changing social and economic challenges. The company has learned to combine tradition and innovation in order to be successful, and also shape a sustainable future. Generational entrepreneurship is more than just a principle – it is our duty.





# **ERFURT IS ONE OF GERMANY'S "BRANDS OF THE CENTURY"**

– FOR ERFURT, IT MEANS SETTING STANDARDS BY COMBINING QUALITY AND SOCIAL RESPONSIBILITY WITH A DEEP UNDERSTANDING OF SUSTAINABILITY.



Since it was founded in 1827, the Erfurt brand has represented entrepreneurial excellence, as well as an active commitment to culture, environmental protection and social cooperation. Today's economic success is therefore not based solely on business acumen, but rather on the systematic acceptance of social responsibility to our employees, the region and society. This dedication and the consciously sustainable use of natural resources form the heart of our corporate philosophy and underline our status as one of the defining German brands of the century.







# OUR TRANSFORMATION INTO THE FUTURE TAKES US FROM A PREDOMINANTLY CLOSED WATER CYCLE TO THE **CIRCULAR ECONOMY**.



Historically, our company has been located in the heart of a nature and landscape conservation area directly on the River Wupper. This location shapes our awareness of nature, and gives us a respect for and appreciation of our habitats, their elements and inhabitants. Whether this involves the use of recycled paper for paper production, the procurement of renewable raw materials or a predominantly closed water cycle – from the outset, we are committed to the sustainable use of resources. Our long-term goal is therefore both passionate and logical: to offer products that are produced without additional greenhouse gas emissions, but which are nonetheless healthy, and circulate in closed material cycles.



# PREFACE



**We live according to our values and focus specifically on the issue of sustainability. Our family-run company is surrounded by natural countryside, so we are very aware of the responsible consumption of resources.**

Dear Readers,

This Sustainability Report provides an insight into our sustainability strategy.

As a family-owned company, it has always been our goal to make the company sustainable and future-proof, and pass it on to the next generation in the best condition. Now in our eighth generation, we have succeeded in doing so.

Our location in the heart of nature was deliberately chosen by our founder Friedrich Erfurt in 1827. Water power was necessary for paper production and the soft water of the River Wupper has a positive impact on the quality of the paper. Today, we are still on the same site and paper production and the development of a specialty

paper machine forms the DNA of our company. Over the years, we have produced different types of paper, from filter and printing paper to velour paper and, in wartime, also emergency money paper, roofing paper and food-grade cardboard.

In every generation, ERFURT has taken responsibility for its employees and the environment around the company. This principle of sustainable corporate governance has been adapted to current circumstances and documented for the first time in this Sustainability Report in accordance with international standards. Our tradition of sustainable corporate governance and the decisions made in the past give us the opportunity today to meet the 1.5-degree climate

target. Furthermore, the success of our commitment to our employees is reflected in an average employee service of 17 years. These aspects can only be achieved through long-term responsible action and show that we truly embody our values.

We are very pleased that you are interested in our Sustainability Strategy.

*Martin Erfurt, Henrik Erfurt and Felicitas Erfurt-Gordon*



*Henrik Erfurt*



*Felicitas Erfurt-Gordon*



*Martin Erfurt*


# THE ERFURT BRAND AND THE COMPANY BEHIND IT

Quality, sustainability and healthy products characterise the essence of ERFURT – a brand that has been synonymous with excellent wall design for almost two centuries. We combine our passion for beautiful homes with a deep sense of responsibility toward the environment and the well-being of our customers. ERFURT is about more than just wallcoverings for discerning people; it also represents a conscious decision for sustainable and healthy wall design. Our products reflect the innovative power of ERFURT and offer a creative variety of designs for inspiring spaces.



The ERFURT logo is displayed in white, uppercase letters on a solid blue rectangular background in the top right corner of the image.

**ERFURT®**

This text block is enclosed in a thin white vertical border on the left side. It features a large number '1864' and a bolded phrase 'WOODCHIP WALLPAPER'.

In **1864**  
the first **WOODCHIP  
WALLPAPER** was  
invented by Hugo  
Erfurt.

This text block is enclosed in a thin white vertical border on the left side. It features a large number '459' and a bolded phrase 'DIFFERENT PRODUCTS'.

**459**  
**DIFFERENT PRODUCTS**  
in our range in 2022.

This text block is enclosed in a thin white vertical border on the left side. It features a large number '30' and a bolded phrase 'COUNTRIES WORLDWIDE'.

in over **30**  
**COUNTRIES WORLDWIDE**  
ERFURT sells innovative,  
design-oriented and  
ecologically sustainable wall  
design solutions.

## THE **ERFURT** BRAND

As a sustainable, family-owned business, ERFURT supplies healthy brand-name products and services for the construction and residential sectors and manufactures innovative specialty papers.

The ERFURT brand name is synonymous with optimum, value-for-money, high-quality wallcoverings. Our brand's central and best-known product is ERFURT Rauhfaser woodchip, a classic with guaranteed wall design success. We therefore assume great responsibility, which is reflected in our corporate values: customer focus, high product quality, and a careful use of natural resources. Our focus is therefore on certified, healthy products with a long service life, which rely on high-quality and renewable raw materials even at the product development stage.

In production, we consistently strive for efficiency with resources in order to reduce waste, residual materials, and energy consumption. Our measures to prevent polluting emissions and effluent support our goal of minimising the impact of our products on people, the environment, and the climate. In addition, we rely on the concept of a circular economy as the key to sustainable and eco-effective business – a central concern that will continue to shape the principles of our ERFURT brand.



## Our principles

**We have been upholding the tradition of an independent family-owned company since 1827.**

**We put our customers at the centre of everything we do.**

**We are successful thanks to our motivated and qualified team.**

**We think and act entrepreneurially.**

**We operate sustainably with a responsibility towards society.**

**We are leading in terms of quality and brand.**

**We work in a trusting and fair manner with our high-performing partners.**

## OUR BRAND **RANGE**

It all started with the classic woodchip wallcovering. The product range now includes a wide range of modern wallcoverings – from smooth and textured nonwovens to interior insulation, specialty paper, and accessories.



**RAUHFASER WOODCHIP**  
Naturally versatile



**VLIES-RAUHFASER NONWOVEN WOODCHIP**  
Naturally adaptable



**EMBOSSSED WALLPAPER**  
Naturally expressive



**EMBOSSSED NONWOVEN WALLPAPER**  
Naturally stylish





**VARIOVLIES NONWOVEN**  
Naturally elegant



**DIGITALLY PRINTED WALLCOVERINGS**  
Graphically beautiful



**ACCESSORIES**  
Useful tools for wallpapering



**STRUKTURVLIES TEXTURED NONWOVEN**  
Ecologically inspiring



**INTERIOR INSULATION**  
Energy-saving



**SPECIALTY PAPERS**  
Customised

## OUR **BUSINESS STRATEGY**

We regard our business strategy as simultaneously our sustainability strategy. Our business-strategic goals are therefore based, among other things, on closed material cycles and minimum CO<sub>2</sub> emissions.

### **Strategic approach**

At ERFURT, we have set ourselves the goal of developing and marketing innovative products and solutions with excellent practical benefits for and with our customers, at the same time taking responsibility for conserving environmental resources. Against this background, we have divided our business and sustainability strategy into the following sections: People, Environment and Digitalisation, in order to be ideally prepared to meet all future requirements.

People are our top priority, because we would not be where we are without our employees. We have always focussed on the environment. This Sustainability Report once again accords it special

importance. Digitalisation is used everywhere to optimise processes, create transparency, and improve our communication.

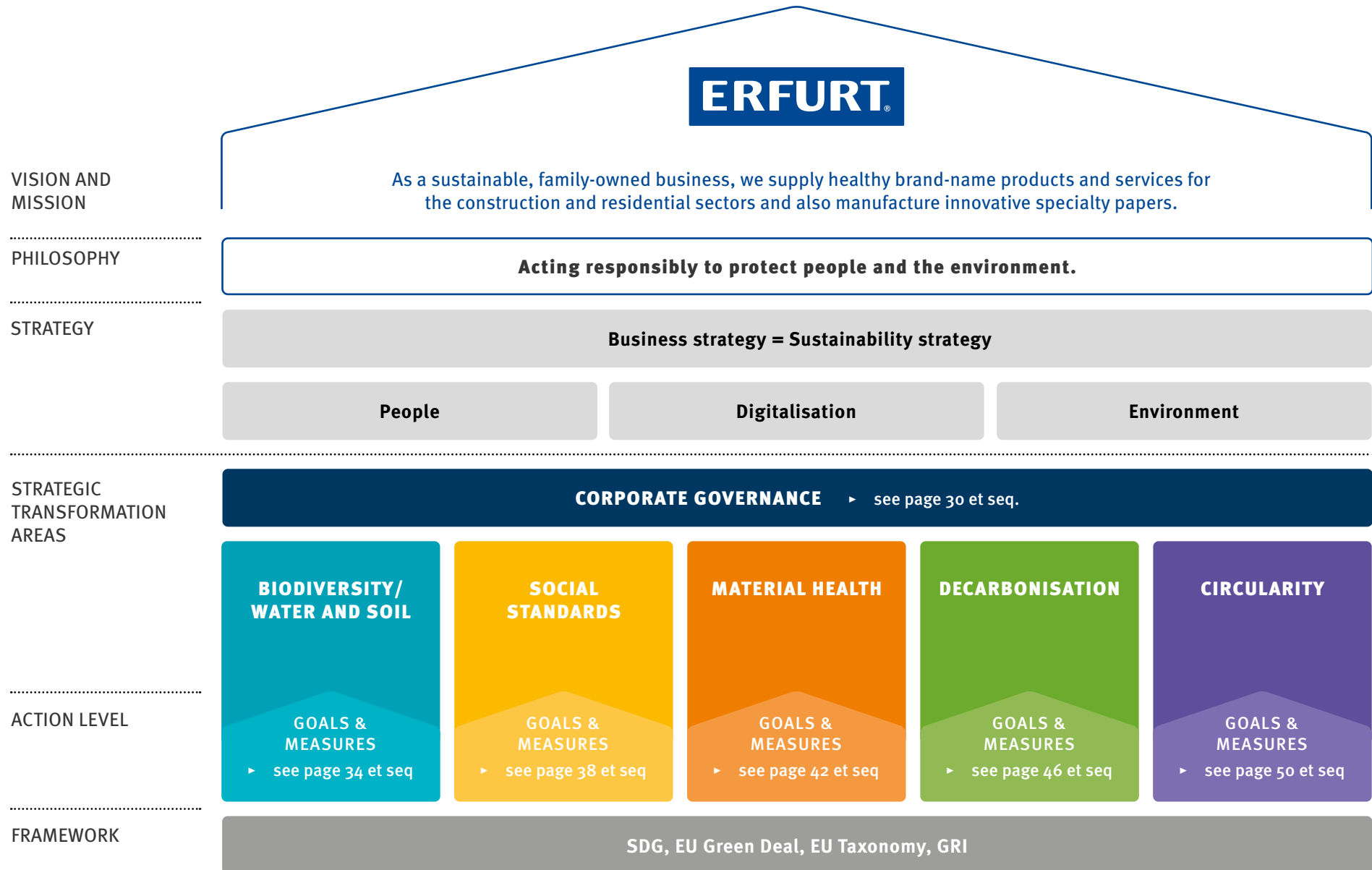
### **Strategic transformation areas**

ERFURT underpins its business strategy with various transformation areas in order to promote innovation, adapt to regulatory changes, act in a customer-focussed manner, and develop sustainable business practices etc. This strategic focus ensures ERFURT's future viability and agility in an increasingly dynamic business environment.

Our business strategy includes the following six transformation areas, which we will focus on and explain in more detail in the following sections:

- ▶ Corporate governance
- ▶ Biodiversity/Water and soil
- ▶ Social standards
- ▶ Material health
- ▶ Decarbonisation
- ▶ Circularity

Framework regulations provide guidance, including the United Nations Sustainable Development Goals (SDGs), the EU Green Deal, EU Taxonomy and the GRI reporting standard.



## Networking

Our company has strong roots in the region and our commitment goes far beyond our mere production processes. Being a pioneer often requires effective networking to drive forward innovation and ensure lasting success. We benefit from new ideas and developments for the future through trusting and long-term collaboration with our partners. In addition to supporting regional, social associations and organisations, it is important for us to enter into new business partnerships and strengthen existing ones.

We would like to highlight in this context our membership of the German Society for Sustainable Building (DGNB) e.V. Membership is based on the fact that wallcovering products are considered as construction products and so play a major role in the interior design of sustainable buildings. ERFURT wishes to contribute to providing developers and planners with sustainable, environmentally-friendly interior design products. It therefore also takes on the role of helping to develop and

further develop sustainability standards for construction products and also supply products to the market that meet recognised standards.



German Federal Association of Homeware & Paint Product Wholesalers e.V.



German Society for Sustainable Building



IBU - German Institute for Construction and the Environment e.V.



Forest Stewardship Council® – FSC® Germany



Association of the Paper-producing Industry in North Rhine-Westphalia e.V.



"Upper Wupper River" Fishing Cooperative



VDT Verband der Deutschen Tapetenindustrie e.V.

Association of the German Wallpaper Industry e. V.



WUPPERVERBAND  
für Wasser, Mensch und Umwelt

Wuppertal Association

SYSTEM LIMITS FOR STRATEGIC TRANSFORMATION

**SITE:** HUGO-ERFURT-STR. 1, 42399 WUPPERTAL, GERMANY

**PARENT COMPANY:** ERFURT & SOHN KG

**PAPER MILL BUSINESS UNIT:**  
german paper solutions GmbH & Co. KG

Production of paper/  
nonwoven as  
semi-finished  
goods



Supplied as spools

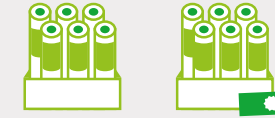


**WALLCOVERING BUSINESS UNIT:**  
Erfurt & Sohn KG

Packaging for retail/sale



Packaging and sale



Relevance of the transformation areas:



Relevance of the transformation areas:



## QUALITY MANAGEMENT, **RESEARCH AND DEVELOPMENT**

As a responsible company, it is important for ERFURT to offer high-quality and healthy products and to design production processes in an efficient and environmentally-friendly manner. We ensure product quality through various certifications and continuously work on product improvements in product development. We use high-quality products that are as sustainable as possible.



**Assured quality standard according to DIN EN ISO**  
Stable and regulated business processes are essential for economic success and product quality. We set great store by our continuous in-house production control and also employ a quality management system certified to DIN EN ISO 9001, which is continuously evolving to meet the requirements of different stakeholders. The quality

management system forms part of an integrated and certified management system, which also includes an environmental management system according to ISO 14001 and an energy management system according to ISO 50001. Our own, professionally trained employees as well as an external team of auditors conduct an annual audit.





### Research & Development

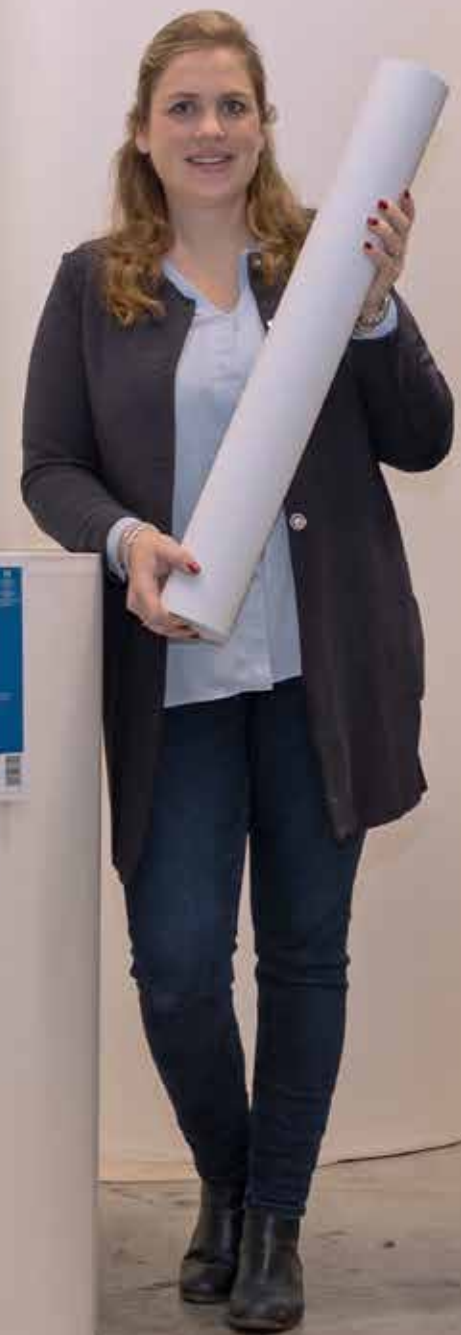
ERFURT's own Technology and Development department employing a number of specialists is involved in the development and further development of products as part of the company's continuous improvement process. Due to our systematic focus on first-class quality standards, it is inevitable that, for technical reasons, material waste is incurred during production. However, this waste is not disposed of; instead, it is re-integrated into the production process. This approach conserves significant resources, at the same time as helping to avoid waste. A new energy-efficient pulper was brought on stream in 2022 in order to further increase the volume of reused materials. This machine dissolves paper and nonwoven materials and enables them to be reused as raw materials in production.

# TRANSFORMATION STRATEGY

Sustainability is an integral part of ERFURT's business strategy. Our transformation approach is based on a thorough materiality analysis that enables us to address the most important challenges of our time. Our focus is on key issues of decarbonisation and the circular economy, which mark a shift from a linear to a circular economy. This strategic focus reflects our deep commitment, as a company and as a trailblazer, to actively contribute to the transformation toward a sustainable future.

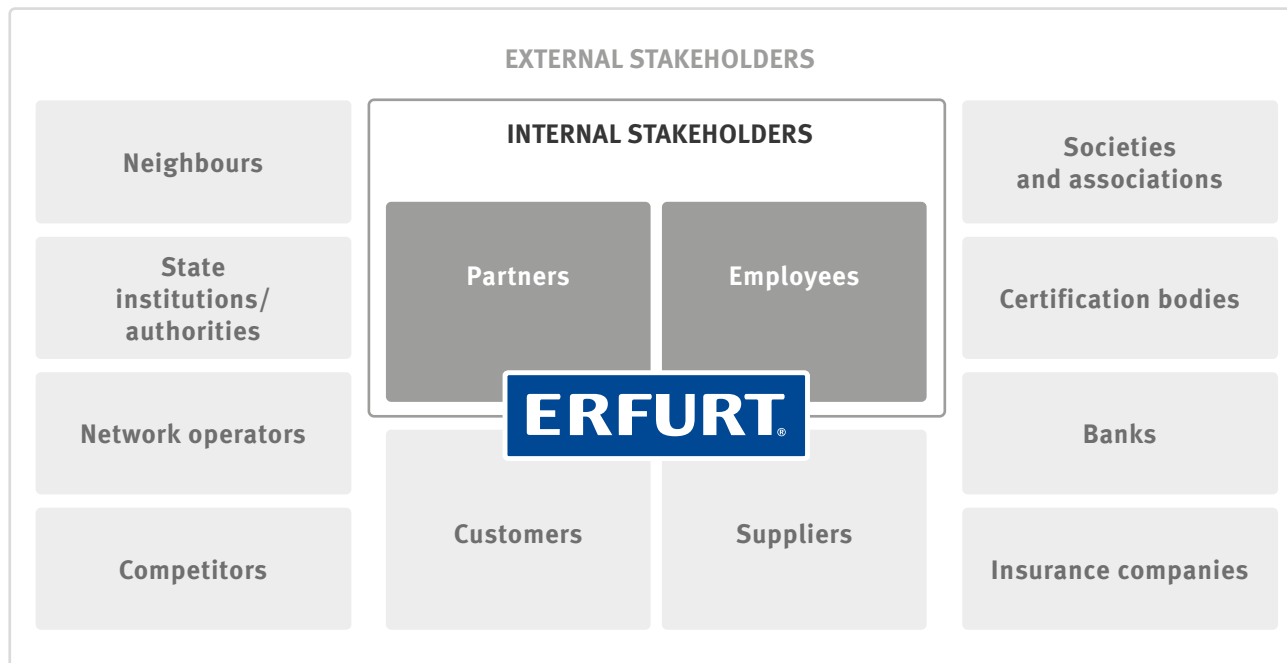






# MATERIALITY ANALYSIS

Identifying and considering relevant issues and aspects, based on a materiality analysis, is crucial for the sustainable survival of ERFURT as well as for intergenerational, sustainable corporate governance. We therefore attach great importance to continuous dialogue with stakeholders.



## Stakeholder dialogue

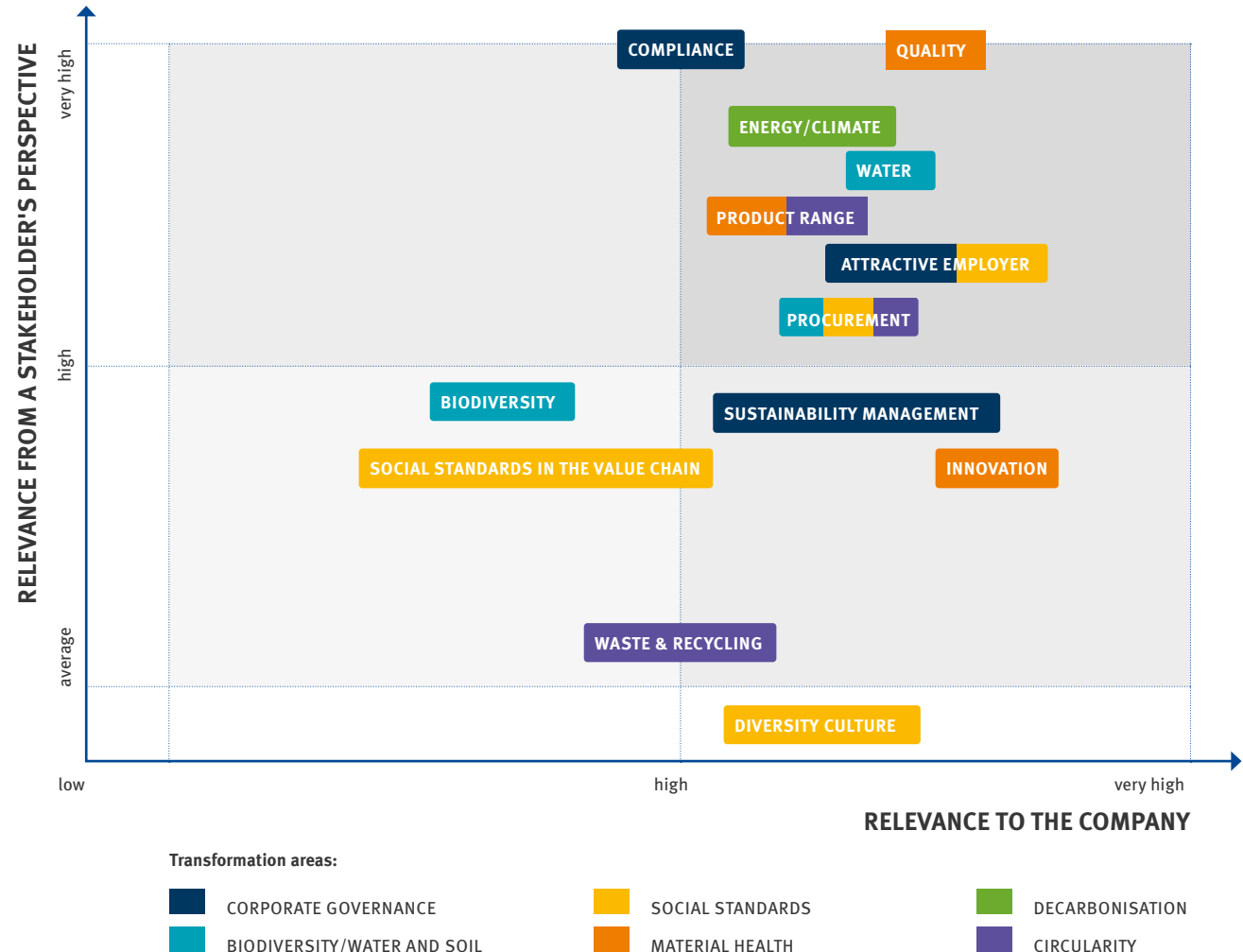
We have had a close and constructive dialogue with stakeholders since the family business was founded. At regular intervals, ERFURT holds discussions with the most important partners, including customers, suppliers, authorities, certification bodies and shareholders. Key issues and aspects are addressed and discussed with corresponding objectives and measures.

## Material issues

The main topics were identified as part of a materiality analysis. We were able to build on existing analysis and documents, which were produced for the introduction of the ISO 9001 quality management system.

The first phase was to analyse key stakeholders, including determining the interests of different stakeholders and assessing potential risks to our company. The second phase involved screening the products/services that represent our company. They were assessed along the entire value chain for negative and positive impacts on the environment, economy and people, and then evaluated for relevance.

The key issues were identified by clustering the essential points from the stakeholder analysis and the product screening into related topics.



## TRANSFORMATION **APPROACH**

In 2022, the materiality analysis and the essential issues derived from it laid the foundation for determining our approach to our transformation strategy.

The transformation areas of corporate governance, biodiversity/water and soil, social standards, material health, decarbonisation and circularity span various dimensions that are important for the long-term stability and sustainability of ERFURT. Overall, focusing on these six areas allows us to target our sustainability strategy and manage and improve both environmental and social impacts. In the long term, this will help us to increase the resilience and success of our company. By focusing on these transformation areas, we are preparing ourselves to

meet current and future requirements, which might arise, for example, from the EU Taxonomy or the anticipated EU Supply Chain Act.

The overarching **Corporate Governance** transformation field includes the topics of compliance, attractive employer and sustainability management. The second area **Biodiversity/Water and Soil** includes the key issues of the same name. The third transformation area **Social Standards** addresses the levels of diversity, occupational health

and safety of employees as well as social standards in the supply chain on the key issue of procurement. The fourth area **Material Health** considers the quality and material health of the products in our range. The **Decarbonisation** transformation area addresses the important issue of energy/climate and is considered of great importance in view of climate change. The **Circularity** transformation area addresses our circular strategy with regard to a circular economy.

**SOCIAL STANDARDS**  
transformation area

- ▶ Attractive employer
- ▶ Procurement

**BIODIVERSITY/  
WATER AND SOIL**  
transformation area

- ▶ Water
- ▶ Procurement

**CORPORATE GOVERNANCE**

- ▶ Compliance
- ▶ Attractive employer

**CIRCULARITY**  
transformation area

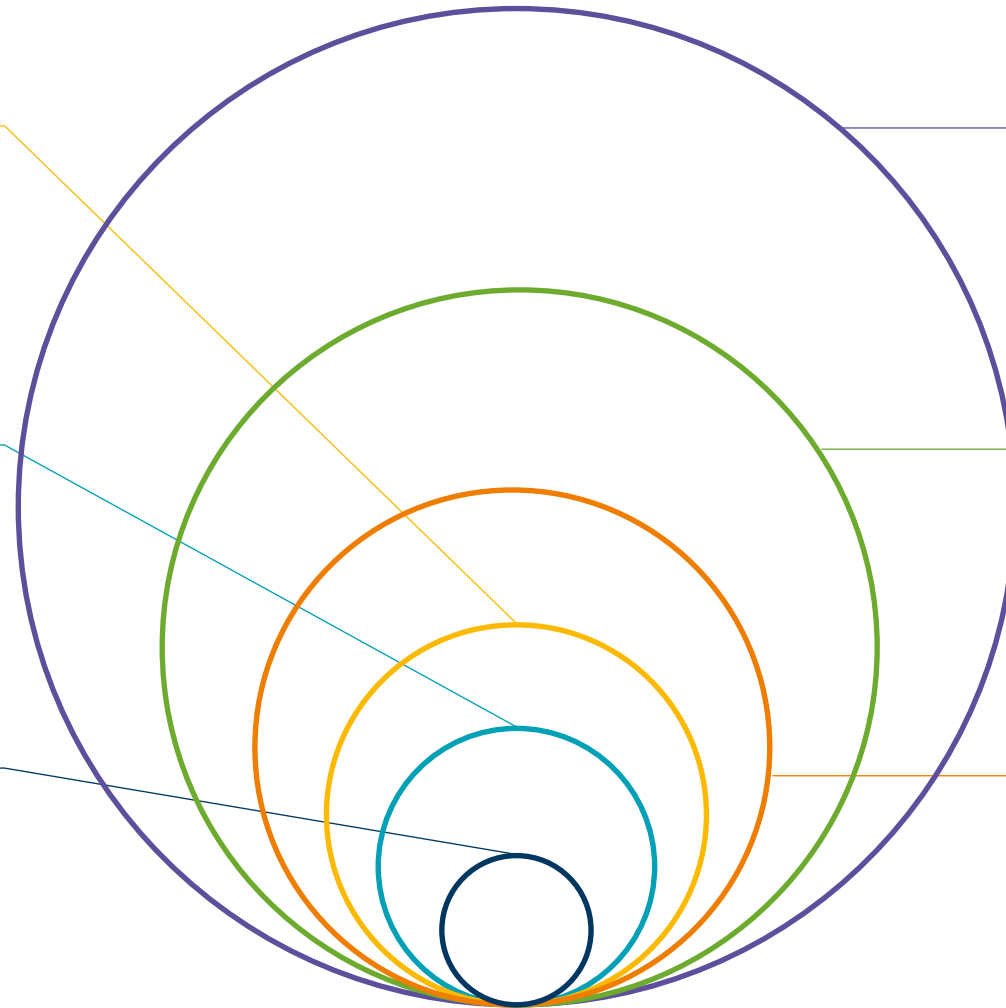
- Procurement ◀
- Product range ◀

**DECARBONISATION**  
transformation area

- Energy/Climate ◀

**MATERIAL HEALTH**  
transformation area

- Quality ◀
- Product range ◀



# CORPORATE **GOVERNANCE**

At ERFURT, we specifically focus on compliance with ethical standards and the promotion of our employees. These priorities form the cornerstones of our sustainable corporate culture and ensure long-term success in all transformation areas.

## Compliance

Our actions are based on the principles of personal responsibility, sincerity, loyalty and respect for people and the environment. These values lay the foundation for sustainable business and will safeguard ERFURT as a family-owned business for generations to come.



### Code of Conduct

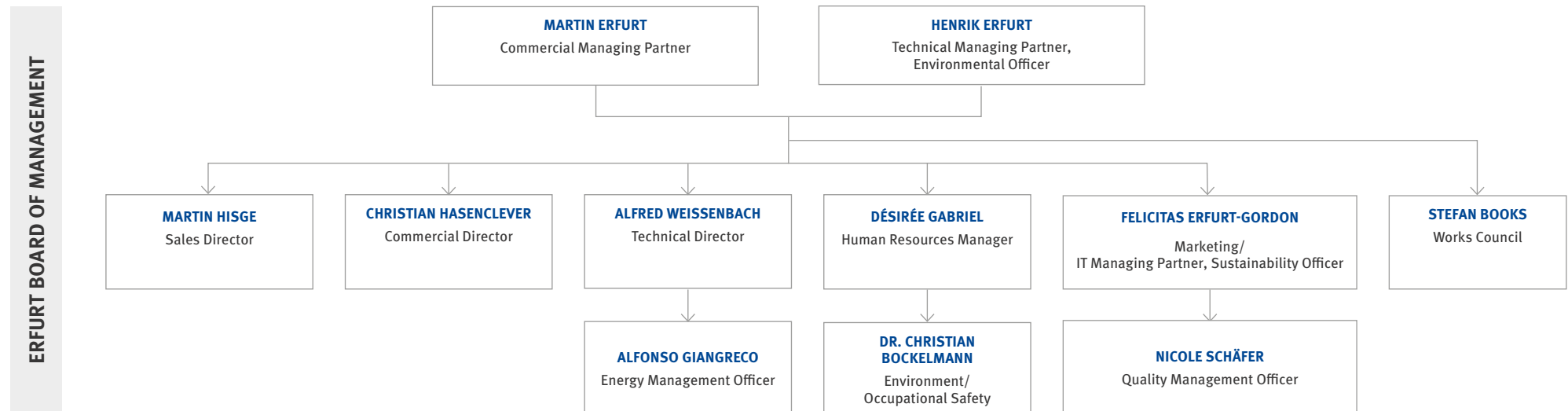
We have set out how ERFURT views itself in our Code of Conduct, which includes our guiding principles and actions, and presents the fundamental and binding elements of our corporate culture. These range from our responsibility at the workplace and as business partners to social responsibility for overall value-based conduct.

→ [www.erfurt.com/de/vision-und-mission/kodex](http://www.erfurt.com/de/vision-und-mission/kodex)

**Organisational chart**

The two personally liable shareholders Henrik Erfurt and Martin Erfurt chair the management team and share responsibility for the Technology (Henrik Erfurt) and Commercial (Martin Erfurt) departments. The management team also consists of a division-based Managing Director for Sales, Production, Commercial and a Managing Director for Marketing, IT and HR Management. Other key positions in the company include administrative departments, such as the Works Council, Quality Management, Environmental/Occupational Safety, and Energy Management.

Within the respective departments, there are also department managers who supervise employees' operational work. Process auditing and results reporting for sustainability management is the responsibility of the Sustainability Officer and Managing Partner Felicitas Erfurt-Gordon.



## Attractive employer: employee development

For ERFURT, production, development and administration employees are all essential elements of the company's success. The professional and personal development of our employees and managers is important to us and contributes decisively to our competitiveness. We promote a wide range of continuing education courses and encourage people to learn independently and to continuously acquire new knowledge and expertise.

In addition to individual funding, succession planning exists to ensure that our strategically relevant positions can be filled internally in the medium and long term. Every year, all employees at ERFURT receive systematic feedback on their performance and achievement of goals as well as the resulting professional outlook. This enables them to actively participate in their individual development.

As a future-orientated employer, it is of great importance to ERFURT to train qualified young people. We offer various apprenticeships, especially in commercial and technical-commercial professions. We attach great importance to apprentices learning to work independently and assuming responsibility. Our average acceptance rate for trainees is around 45%.

It is important to us to fill training places, at the same time as keeping young career-starters with the company in the long term. We therefore also offer various entry opportunities, including internships or dual degrees. We start with interested secondary school students and maintain cooperative partnerships with schools and other educational partners in the area.

**325** Total **employees**  
in 2022

Men  
**276** 

Women  
**49** 

Apprentices  
**21**





“

Being an entrepreneur means helping to shape the future. This can only be achieved with a great team and people who look outside of the box.

Felicitas Erfurt-Gordon

## TRANSFORMATION AREA **BIODIVERSITY/WATER AND SOIL**

ERFURT's production site stands today, historically grown, in the heart of the River Wupper nature and landscape conservation area. For this reason alone, we take the most serious responsibility for the preservation of the local natural water quality and biodiversity.

### **Water management at ERFURT**

#### **Careful removal of water from the River Wupper for paper production**

Soft water is crucial for paper production at ERFURT, as it prevents deposits, improves the paper quality, reduces the consumption of chemicals, and ensures environmentally-friendly production processes. Extracting water from the River Wupper is crucial and is an important issue for our production. In paper production, the extracted River Wupper water acts as a versatile dispersing and transport medium for the

fibres used, with our infrastructure operated in line with the relevant regulations in cooperation with the River Wupper Association.

#### **Minimised consumption of water from the River Wupper by the operation of a predominantly closed water cycle**

Water extraction is necessary because the required amount of water cannot be met by water supplied by utilities companies. We conserve our resource of

drinking water and ensure the availability of drinking water for the region by removing fresh water from the River Wupper. We also use a predominantly closed water cycle in production, which reduces water consumption to a minimum.



### **Certified environmental management**

We operate a certified environmental management system in accordance with DIN ISO EN 14001.

The system ensures that our Environmental Manager monitors regular water extraction, discharge and consumption, and records this company-wide as part of our annual environmental data collection process.

There is also a workday analysis and documentation of defined quality parameters by our own laboratory. This enables changes in water quality to be noticed and, if necessary, reported to the bodies responsible for water maintenance. We aim to install even more measuring points in our plant in order to reduce our water consumption in a more targeted and effective way.



## Investment in biodiversity to avoid negative impacts

### Biodiversity on the River Wupper

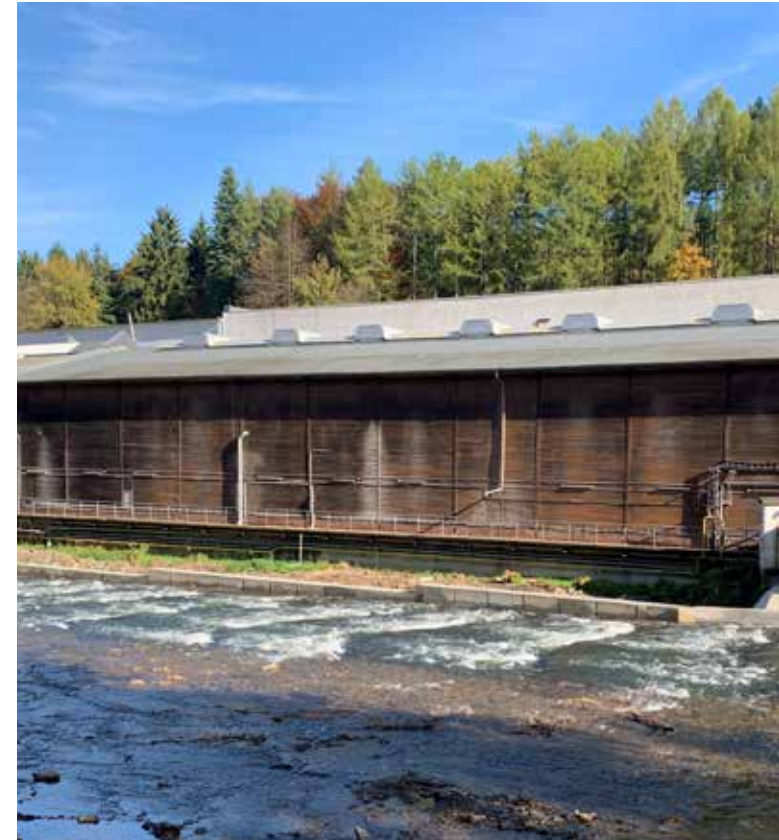
Many different forms of life have made their homes in and around the River Wupper – from salmon to many species of heron. ERFURT has been actively involved in the natural development of water extraction points in order to remove water from the environment in a gentle and careful manner. In this context, care was taken not to use pumps to avoid dangerous suction for animals in the water. Additional protective rakes prevent animals from being drawn in. Together with the River Wupper Association, our long-term regional water management partner, we have designed and built a state-of-the-art fish ladder to replace the fish ladder that dates back to the 1990s. This provides a safe route for migrating fish to return to their spawning grounds.

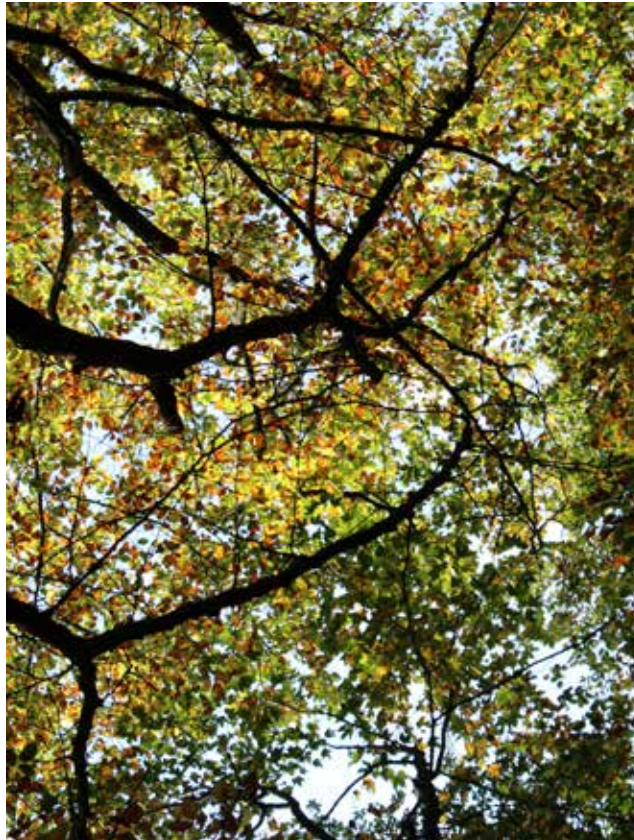
### Our own forest

At our production site, we are surrounded by an extensive landscape of trees and plants and we have also planted and manage our own forest with a sustainable selection of tree species.

**175** ha

**OF FOREST** are managed by the Erfurt family.





## Procurement that promotes biodiversity



Das Zeichen für  
verantwortungsvolle  
Waldwirtschaft

We also consistently implement our sustainability requirements in the procurement of cellulose by ensuring that the raw materials are FSC® or PEFC-certified. These certifications guarantee sustainably managed forestry. The above organisations conduct regular audits to ensure that economic and environmental standards are met along the value chain.

## TRANSFORMATION AREA SOCIAL STANDARDS

ERFURT is synonymous with respectful and partnership-based working relationships, diversity and tolerance in order to achieve the highest level of innovation, creativity and efficiency. Clear guidelines form the basis for sustainable partnerships with suppliers.

In the Social Standards business transformation area, we are currently focusing on the key issues of procurement and ensuring that we are an attractive employer. This is about how we, as a company, integrate social standards into our internal business practices and ensure that they are upheld in our supply chain.

### Attractive employer: employee development

#### Diversity and equal opportunities

We are successful thanks to our motivated and qualified employees and put our trust in the abilities of each and every individual. The cohesion of our workforce is a very important aspect for us.

The diversity of our workforce with their different experiences, knowledge and perspectives ensures our economic success. We are committed to ensuring that every person, in his or her uniqueness, feels that they belong. As a company, we also promote equal opportunities by making work in mixed teams open and fair and by making space for creativity. We attach great importance to mutual support and

help, so that everyone has the chance to develop their full potential at ERFURT.

ERFURT is committed to paying fair remuneration. Pay and salaries are therefore based on the collective pay agreement negotiated by the industry's representative trade union. We also offer working time models that meet different life situations and operational requirements as flexibly as possible. ERFURT also has short communication paths, which engender commonality and cohesion. We encourage individual strengths and ensure that all employees have the best possible conditions for carrying out their duties.

# 17 YEARS

is the average service life of  
ERFURT employees.

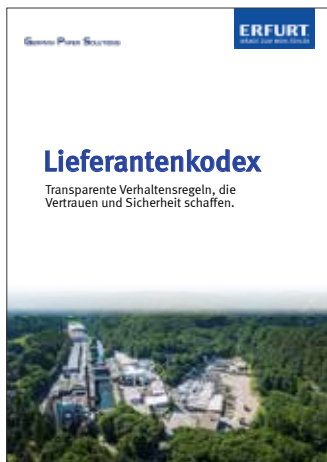


### Health and work-life balance in the workplace

We offer our employees a wide range of different measures and schemes to ensure a good work-life balance, at the same time as promoting the health of our workforce. As part of ERFURT's health initiative, we organise weekly back training and a company-wide run. Our introduction of the Jobrad company bike leasing concept is another example of what we are doing to promote health and fitness within the company. Our employees can also take advantage of preventative medical examinations through our company doctor. We offer employees a company pension scheme. We also plan to modernise our workplaces, meeting and staff rooms by 2027. All office workplaces are equipped with height-adjustable desks to improve ergonomics at the workplace and prevent back problems caused by prolonged periods of sitting.

## Procurement: supply chain management

ERFURT respects and protects all regulations governing the protection of human rights and environmental standards as fundamental and universally valid requirements. We reject all child, forced and compulsory labour, as well as all forms of modern slavery. This applies to cooperation within our company, but also, of course, to the conduct of and toward business partners. We rely on long-term, partnership-based supplier relationships, because this is the only way we can take responsibility for the supply chain.



### Supplier Code of Conduct

Suppliers are governed by a Supplier Code of Conduct that obliges them to comply with basic environmental and social standards. We will also produce a questionnaire to obtain information on the supplier, raw material countries of origin, and production sites. Even if ERFURT is not yet directly affected by the Act on Corporate Due Diligence in Supply Chains (LkSG), which came into force in 2023, we would like to address the issue at an early stage. To this end, we plan to carry out a risk analysis and

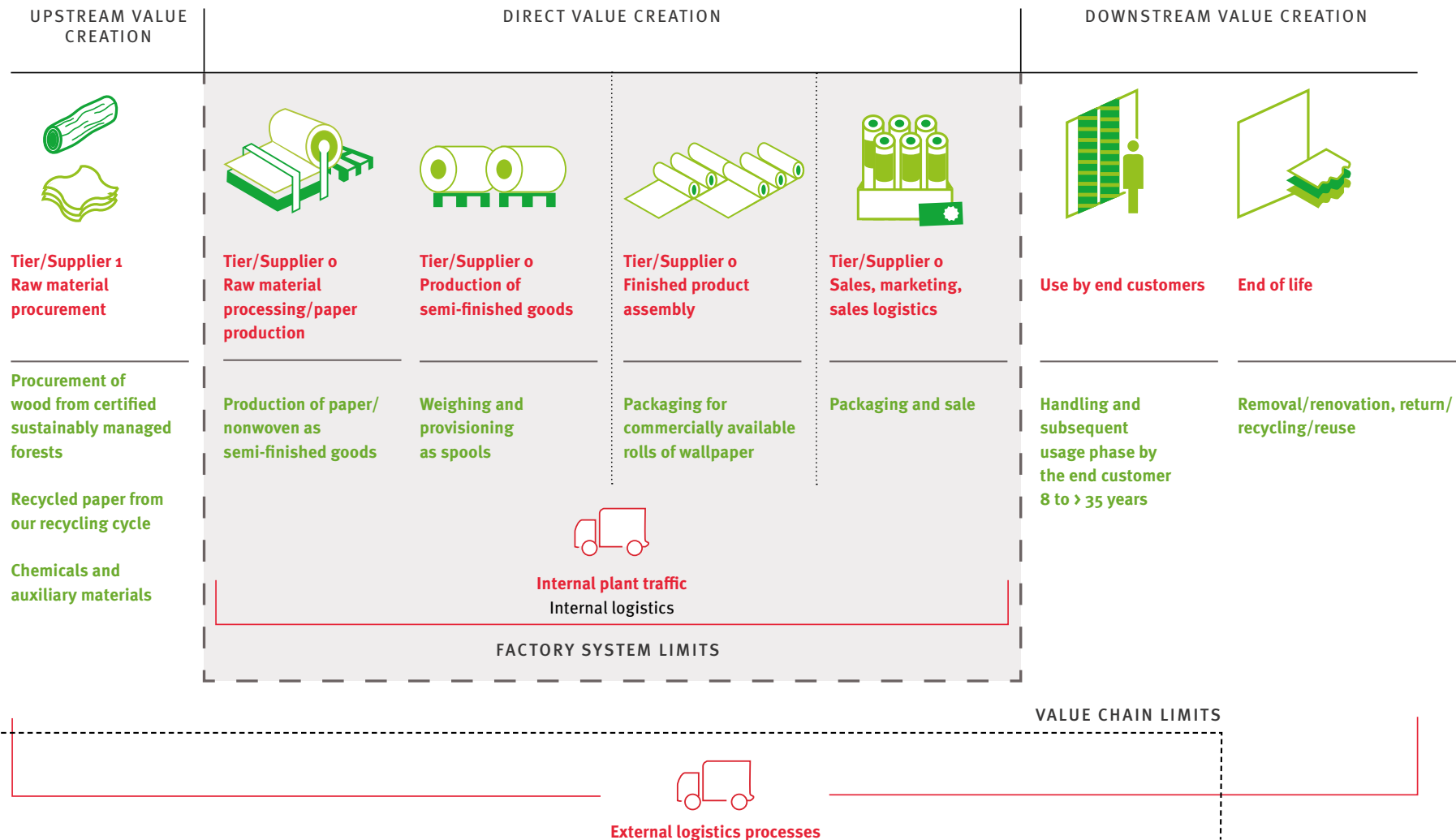
evaluate our key suppliers on various issues, including country-specific risks (in line with amfori BSCI), human and labour rights, environmental protection, anti-corruption, and occupational safety. To date, ERFURT has already set up a contact point to receive information or suspicions of violations of the Code of Conduct or Supplier Code of Conduct. The information received will be carefully checked for accuracy and treated confidentially. Corrective action will be taken immediately in the event of a violation of any of the codes being established.

ERFURT is committed to regional economic development and therefore also considers the supplier's location alongside business factors when selecting suppliers. We actively support our own regional economy by procuring around 10% from the Wuppertal region and neighbouring towns and cities in 2022. At the same time, this made it easier to ensure social standards along our supply chain. The majority of our suppliers (about 84% of ERFURT's purchasing volume) are located in Germany, with only a very small percentage of about 0.1% of our purchasing volume coming from outside the European Community.

→ [www.erfurt.com/fileadmin/user\\_upload/mitarbeiter/Erfurt\\_Einkauf/Lieferantenkodex\\_ERFURT\\_GPS\\_26.01.2023.pdf](http://www.erfurt.com/fileadmin/user_upload/mitarbeiter/Erfurt_Einkauf/Lieferantenkodex_ERFURT_GPS_26.01.2023.pdf)



**ENSURING DUE DILIGENCE IN THE VALUE CHAIN**



## TRANSFORMATION AREA MATERIAL HEALTH

Material health forms the basis for a functioning circular economy in order to maintain good quality and non-toxic resources.

The safety and health of our customers is an absolute priority for ERFURT. To this end, we implement specific measures and certification standards to ensure that the materials we use are of high quality and also healthy. This conviction is dealt with within the Material Health transformation area and is addressed by looking at the issues of quality and product range.

### Quality

We focus on the use of high-quality raw materials that are as sustainable as possible right from the product development stage.

Compliance with recognised quality standards is guaranteed by our quality assurance process. The safe and economical handling of our products is regularly checked by our Application Engineering team, in our Technical Centre, and on construction sites. Intensive work with industry associations, cooperation with authorities and the use of external service providers (compliance checks) ensure that all ERFURT products conform to market standards.

Our wallcoverings are free of any harmful substances and contain no fibreglass, plasticisers, PVC or solvents. They are especially low in emissions and are regularly tested by the Cologne ECO Institute in accordance with the current Committee for the Health-related Evaluation of Building Products (AgBB) Standard.

ERFURT is certified to ISO 9001. Our quality management system guarantees high standards and ensures that we continuously develop to meet the requirements of diverse stakeholders.



### **Environmental Product Declarations according to ISO 14025 and EN 15804 provide the data basis for product transformation**

The Environmental Product Declarations (EPDs) produced in 2021 according to ISO 14025 and EN 15804 for the products ERFURT woodchip wallpaper and nonwoven woodchip wallpaper provide an important data basis for the areas that address product transformation. These comprehensive examinations look at the environmental impact of the two ERFURT construction products over their entire life cycle and have achieved an above-average score compared to the market. Further goals and measures will be defined based on these documents.



## Sustainable and healthy product range

Over and above legally prescribed material tests, for instance to obtain the CE mark, we reinforce our contribution to a healthy environment through voluntary and extensive material tests with appropriate certification.

In order to take material health to a new level, we are planning a comprehensive mid-term assessment in line with the Cradle to Cradle Certified® product standard for some of our products. Material health is a key aspect of this certification and underlines our commitment to protecting the health of our customers.



STANDARD  
100  
22.0.02032  
Hohenstein HTTI



### OEKO-TEX® STANDARD 100 and TÜV North Test Centre allergy seal

The material test is carried out by an independent OEKO-TEX® institute and ensures that each product component is tested for harmful pollutants and classified as harmless to human ecology. ERFURT also offers wallcoverings suitable for use by allergy sufferers, which have been awarded the TÜV North Test Centre allergy seal.





### Blue Angel

ERFURT's products that carry the Blue Angel quality seal are characterised by their environmental and health-related properties and meet strict criteria. Blue Angel certification provides our customers with the certainty that they are opting for quality products with a low environmental impact and positive health-related protection compared to some other products with the same purpose.

→ [www.blauer-engel.de/uz35](http://www.blauer-engel.de/uz35)



### QNG Ready seal awarded by the Sentinel Haus Institute

ERFURT has successfully certified most of its products with the "QNG Ready" quality seal awarded by the Sentinel Haus Institute (SHI). This quality seal focuses on the material health of construction products. The certified products are crucial for compliance with the criteria to obtain the state "Quality Seal for Sustainable Buildings" (QNG). This quality seal enables interested parties to apply for a KfW development and investment loan that promotes sustainable building. QNG certification evaluates the entire integrated system of a building. The "QNG Ready" quality seal greatly simplifies the certification process.

## TRANSFORMATION AREA DECARBONISATION

ERFURT is guided by the 1.5 degree climate target of the Paris Agreement signed at the 2015 United Nations Climate Conference. The objective is to limit the global temperature increase caused by man to 1.5 °C compared to pre-industrial times by 2100.

Our decarbonisation strategy pursues the goal of reducing greenhouse gas emissions by at least 4.2% annually in a linear manner between 2023 and 2030. We will therefore reduce our CO<sub>2</sub>e emissions by more than 50% from 1990 to 2030 and by 88% by 2040 from the base year of 1990.

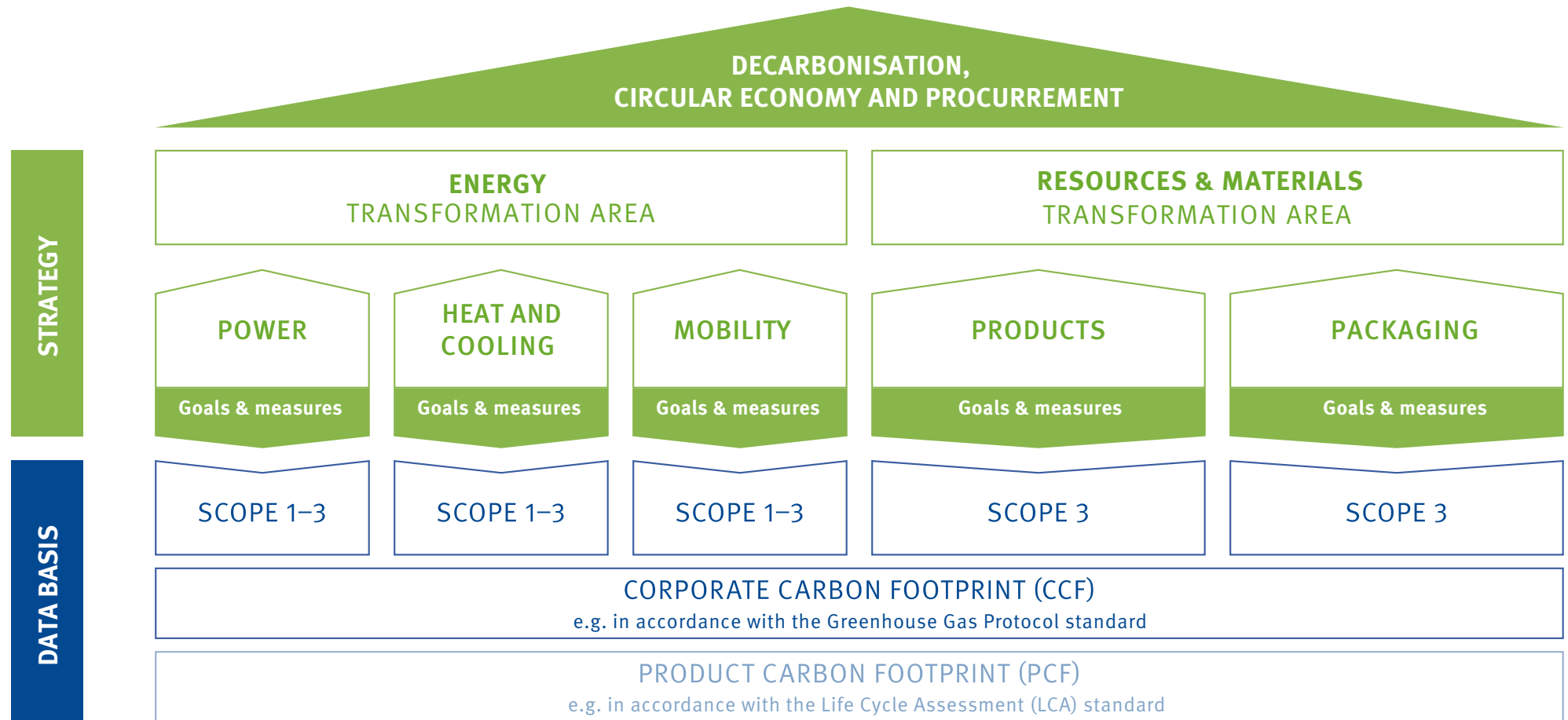
Our decarbonisation strategy is divided into the two transformation areas of energy and resources, and materials. Our current focus

is on the energy transformation area and more specifically on electricity and heat.

The next step is to define the 1.5-degree target roadmaps for the individual transformation areas in accordance with the Science Based Targets and to develop specific corporate goals and implementation measures.

**33,503** tonnes  
**CO<sub>2</sub>e EMISSIONS**  
were approved as Scope 1  
and Scope 2 in 2022.

## Decarbonisation strategy



## Energy-based decarbonisation to reduce negative impacts on the climate

As an energy-intensive company with a paper production plant, ERFURT requires a large volume of energy resources in the form of electricity and process heat. This energy is partly generated in our own power plant using fossil fuels and is used, for example, to dry the lengths of paper. We have therefore defined energy/climate as the key issue at an action level in the decarbonisation area and have installed a certified energy management system in

accordance with DIN EN ISO 50001.

In this context, we have drawn up a comprehensive list of projects to save energy and increase energy efficiency from 2023 to 2030. Individual measures have already been implemented, and further projects are still in the planning stage.

## Carbon footprint

ERFURT has produced a CO<sub>2</sub>e corporate carbon footprint for Scope 1, 2 and 3 in accordance with the Greenhouse Gas Protocol (Corporate Carbon Footprint-CCF) for 2021 and 2022. The aim of climate accounting is to calculate the greenhouse gas emissions generated by ERFURT's business activities. The results lead to a classification in terms of the objectives of the Paris Climate Agreement. At the same time, the CCF provides a solid basis for

the development of corporate climate protection strategies. An analysis of the CCF can be used to identify potential reductions and derive climate protection measures. In future, we will be able to check the effectiveness of measures initiated by means of regular carbon footprints. We have therefore decided to draw up an annual carbon footprint for ERFURT.





PRIMARY GOALS	SECONDARY GOALS	MEASURES	TIMELINE	STATUS
Saving of more than 50% CO <sub>2</sub> e emissions by 2030	Optimisation of the energy procurement of electricity	Expansion of power generation from PV systems on the factory premises to 1,400 kWp	from 12/2022	23% achieved
		Conclusion of a Power Purchase Agreement (PPA) via an external PV system with 3,500 MWh	2023–2027	achieved
		Increased grid purchase of green electricity to approx. 30%	–	achieved
		Purchase of certificates of origin for the partial neutralisation of electricity purchased from the grid	–	planned
	Optimisation of the energy procurement of fuels	Fuel neutralisation for generator power by means of VCS certificates	2023–2025	achieved
		Procurement of biogenic gases	–	Enquiry made
		Conversion of K4 from coal dust to biogenic dust	from 2023	Feasibility study commissioned
		Admixture of hydrogen to the supply of natural gas	from 2033	planned
	Increased energy efficiency in plant technology	Replacement of the press section with a shoe press	from 2025	currently being implemented
		Optimisation of the compressed air system including heat recovery	from 08/2021	achieved
		New pulper	from 12/2022	achieved
		Insulation of buildings	from 2021	ongoing
NTP and VTP heat recovery hood		from 09/2023	planned	
Saving of 88% CO <sub>2</sub> e emissions by 2040 and greenhouse gas neutrality by 2045	Heat processes are replaced by electricity processes*	–	–	currently being planned
	Energy storage – Power to Heat*	–	–	currently being planned
	Solar thermal energy – heat from the sun*	–	–	currently being planned

\*Option that needs to be checked and validated in future

## TRANSFORMATION AREA CIRCULARITY

Material cycles ensure the availability of raw materials while conserving natural resources. With this in mind, we want to make our products fit for circulation by 2030 and position ERFURT as a pioneer for the circular economy in the residential sector.

Our central objective focuses on two closely linked aspects: the optimisation of our processes to close the material and/or substance cycles and the use of renewable raw materials as well as secondary materials for our products. This approach is critical to minimising our consumption of resources and significantly reducing our environmental footprint

### Recyclability of materials and products

Our goal is to keep today's resources in circulation for tomorrow and to avoid waste. Currently, all products from the ERFURT range are disposed of through normal household waste at the end of their life cycle and are thermally recovered. Only a small proportion of the products are returned from quality control in production or as returns from retailers. The strategic goal is also to return material in a closed loop at the end of its usage phase. Decarbonised production processes are the prerequisite for this.

We were the first company in the industry to launch a flat nonwoven wallcovering solely produced from

**100 %**  
**RECYCLED FIBRES.**

# Circular Economy Strategy 2030

Decarbonisation under the conditions of climate-neutral production processes through renewable energies (process-related CO<sub>2</sub>e emissions) as well as safeguarding environmental-related and human rights-based due diligence obligations in the supply chain through due diligence checks and compliance

### Wallpaper material flows

- Wallpaper material flow
- Wood (from forests)
- Recycled paper



\*Disposal of mixed municipal waste (AVV 20 03 01) and mixed construction and demolition waste (AVV 17 09 04)  
Toxicity test with positive (✓) or negative (✗) result; tested using pre-certified materials or lab tests?

### Energy material flows:

- Grey energy
- Green energy
- Power consumption
- Heat consumption



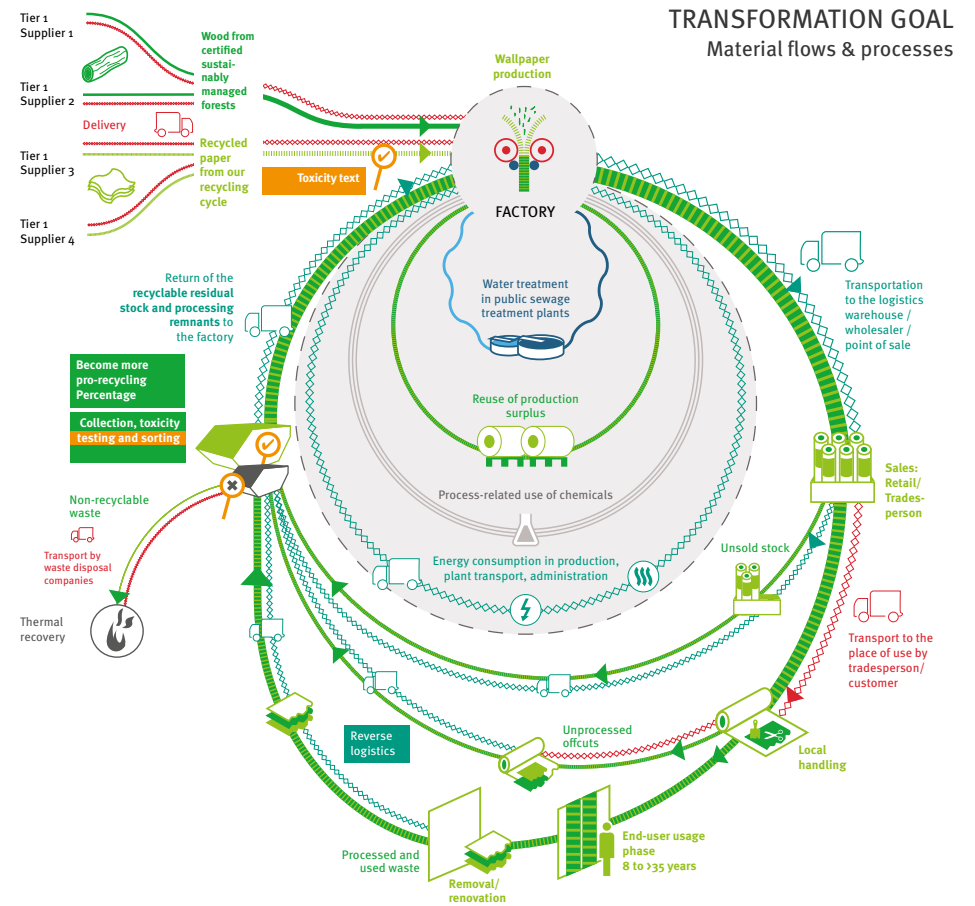
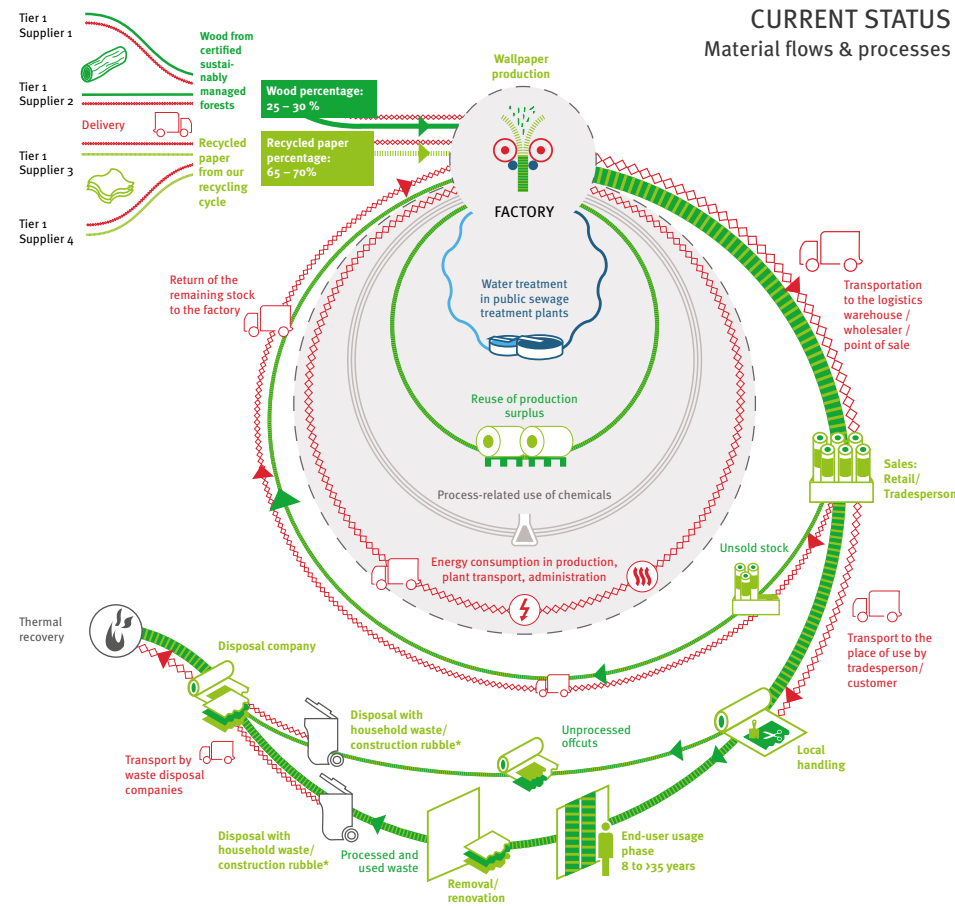
### Water material stream

- Process water taken from the stream
- Purified process water discharged into the stream



### Process chemicals material flow

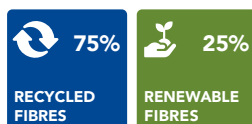
Factory system limits  
Production/manufacturing processes, plant traffic and administration for german paper solutions GmbH & Co. KG and Erfurt & Sohn KG



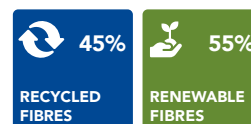
## Procurement and use of recycled and renewable materials

In product development, we rely on high-quality and preferably renewable raw materials. The renewable materials in our products consist solely of PEFC-certified wood and FSC®-certified cellulose obtained from sustainably and responsibly managed forestry schemes.

Our goal is to achieve a high recycling percentage by producing products from recycled and renewable raw materials. This contributes to the meaningful reuse of existing material, but also helps to reduce greenhouse gas emissions. Our material selection includes high-quality recycled paper and recycled textile fibres. The use of recycled paper can save 60% of the energy and water consumption. We continue to use the production waste, including edge trimmings or off-cuts, as a raw material, significantly helping to reduce waste.



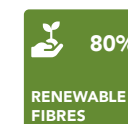
**ERFURT-Rauhfaser**



**ERFURT-Vlies-Rauhfaser**



**ERFURT-Variovlies ECO PLUS**



**ERFURT-Variovlies & Vliesfaser**

## Planned actions from 2023

### Development of a circularity strategy

Our primary goal is to develop a comprehensive circularity strategy for our wallcoverings. As early as the product development stage, we intensively deal with the 'Cradle to Cradle' design concept and examine ways in which wallpaper remnants can be returned to production as valuable raw materials, for instance after renovation work. This work is based on an in-depth analysis of the life cycles of our products and our pursuit of innovative approaches for effective return after use.



### Plastic-free packaging

ERFURT's goal is a complete conversion to plastic-free packaging for all wallpaper products. This is achieved by introducing a double sleeve in place of shrink-wrap packaging. The first step of this initiative is our investment in the packaging plant for Woodchip 52, which will be implemented from 2023 onwards. Building on the experience of this project, we aim to package all wallpaper products in the long term without the use of plastic.



# FRAMEWORK

Global standards form the structural basis for ERFURT's sustainability progress. First and foremost is the GRI Report, which acts as a guide for us all, particularly with regard to our interaction with the European ESRS Standard. These frameworks serve as guidelines for transparent and comparable sustainability development at ERFURT.





“  
Remain curious...  
Solutions are found  
by searching them out.”

Martin Erfurt

## REPORTING LIMITS

This report marks a milestone as ERFURT's first comprehensive Sustainability Report. This report adheres to the GRI reporting method, which is based on the 2021 GRI Standards.

A key element of this report is the definition of key aspects and their importance to the business. These key issues were identified through various processes that build on each other and are described in detail in the report. A materiality matrix was used to prioritise the issues and clarify their relevance for sustainable development at ERFURT.

The reporting period extends from 01.01.2022 to 31.12.2022. ERFURT's sustainable practices and work are presented within this timeframe. This report thus provides an insight into the company's sustainable

initiatives and underlines its commitment to social responsibility and environmental protection.

### Applicability

This Sustainability Report deals with the collaborative work of two independent companies, german paper solutions GmbH & Co. KG and Erfurt & Sohn KG, which both operate under the name ERFURT at Hugo-Erfurt-Strasse 1, 42399 Wuppertal, Germany. Although legally independent, they operate together at this site and are considered

jointly in this report. The report provides a summary of their collective sustainability practices and confirms their shared commitment to social and environmental responsibility under the ERFURT brand.

The precise system limits that define the scope and extent of our reporting are illustrated on **page 21** of this report. They include all relevant activities and impacts of both companies within the defined reporting period.



## Data collection

The information in this report is based on data collected by the company itself using "leadity" reporting software produced by fjol-digital GmbH and using the GRI licence. Data is collected for non-financial reporting, with business figures not being published. Comparisons with previous reports are not yet possible as this is ERFURT's first Sustainability Report based on the GRI Standards.

### Greenhouse gas emission data collection

The methodology used for data collection for our Corporate Carbon Footprint includes the collection of information on Scope 1, Scope 2 and Scope 3 emissions using specific data collection templates. Consumption data is used to convert emissions into CO<sub>2</sub> equivalents (CO<sub>2</sub>e). Inaccurate consumption data is estimated or scaled. The quality of the data collected is explained separately.

## Disclaimer

The collection and processing of all information in the Sustainability Report was carried out with the utmost care. Nevertheless, we cannot guarantee that the information is completely without errors. The calculations presented can result in minimal deviations caused by the rounding up/down of decimal places. These minor differences are normal and should not significantly affect the accuracy of the information. When interpreting the results, it is recommended that an appropriate error tolerance is taken into account.

## Forward-looking statements and risk factors

All forward-looking statements were made based on current assumptions and estimates at the time of publication. It is important to note that these statements may be subject to various risks and uncertainties.

### Gender-neutral wording

In the report, ERFURT prefers to use gender-neutral names and, in various places, both the female and the male form for gender-appropriate language. Compound words are an exception to this to improve understanding. However, it must be expressly stated that all genders are meant.

# GRI REPORTING

## GRI 2: General information

### GRI 2–1: Organisational profile



**ERFURT & SOHN KG**  
Hugo-Erfurt-Strasse 1  
42399 Wuppertal  
Germany



**german paper solutions GmbH & Co. KG**  
Wupperstrasse 38  
58332 Schwelm  
Germany

### GRI 2–2: Entities included in the organisation's sustainability reporting

**ERFURT & SOHN KG** is the parent company.

**german paper solutions GmbH & Co. KG** is a 100% subsidiary of **ERFURT & SOHN KG** and is responsible for paper and nonwoven production and acts as a supplier to **ERFURT & SOHN KG**.

Note: This report uses the term **ERFURT** when referring to the aforementioned companies.

### GRI 2–3: Reporting period, reporting frequency, and contact point

Reporting period:

01.01.2022 to 31.12.2022.

The report will be updated every 2 years.

Publication date:

28.02.2024

Contact for the Sustainability Report:

Nicole Schäfer (Tel. no.: +49 202 6110321)

Financial reporting period:

01.01.2022 to 31.12.2022.

The financial report is prepared annually in compliance with the legal requirements according to HGB §242.

### GRI 2–4: Correction or new presentation of information

This is the first Sustainability Report in accordance with the GRI Standards that **ERFURT** has produced. Therefore, there is no corrected or new presentation of information.

### GRI 2–5: External review

This Sustainability Report has not undergone external review. The highest governance body is responsible for the review.

## GRI 2–7: Employees

All employees are systematically recorded. This enables automatic reporting of absolute employee numbers in terms of factors such as gender and employment. The personal data is as of 31.12.2022 .

	Unit	2021	2022
Women	FTE	-	49
Men	FTE	-	276
<b>Total</b>	<b>FTE</b>	<b>-</b>	<b>325</b>
number of which are in training	FTE	-	21
number of which are full-time	FTE	-	308
number of which are part-time	FTE	-	17

## GRI 2–8: Workers who are not employees

There is no relevant number of people who are not employed at ERFURT.

## GRI 2–11: Chair of the highest governance body

The two personally liable shareholders Henrik Erfurt and Martin Erfurt chair the management team and share responsibility for the Technology (Henrik Erfurt) and Commercial (Martin Erfurt) departments. The management team also consists of a Managing Director for Sales, Production, Commercial and a Managing Director for Marketing and IT as well as HR Management.

## GRI 2–12: The role of the highest governance body in overseeing the management of impacts

The management as the highest governance body of ERFURT has sub-divided cross-divisional tactical and strategic goals into the areas People, Environment and Digitalisation. Strategy development, including the development of values, mission statements and goals, is done at annual Strategy Days. The pursuit of corporate goals and projects is reviewed in monthly management meetings and, if necessary, further measures are decided upon. Depending on the requirements, the respective department managers will participate, and issues and requirements for contact with external stakeholders will be discussed.

## GRI 2–14: Role of the highest governance body in sustainability reporting

Sustainability reporting is carried out in the form of the Sustainability Report every 2 years until 2026 and annually from 2026 onwards. The Sustainability Report is prepared by the Sustainability team and evaluated by the Business Performance team. The management team and the managing partners are informed by their departmental representatives of the department in the sustainability team.

## GRI 2–15: Conflicts of interest

No conflicts of interest are known and are avoided by mandatory compliance with the Code of Conduct.

## GRI 2–17: Collective knowledge of the highest governance body

The sustainability strategy was developed with the help of a consulting firm specialising in sustainability. In the year under review, the entire management group of 18 employees received training on the sustainability strategy.

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### GRI 2–18: Evaluation of the performance of the highest governance body

The management of ERFURT is supervised by an Advisory Board.

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### GRI 2–19: Remuneration policies

The members of the highest governance body receive:

- ▶ Fixed annual remuneration (divided into 1/12 per month)
- ▶ Variable remuneration based on personal target agreements and the company's profit
- ▶ A bonus
- ▶ A company car with permission for private use
- ▶ The possibility of company retirement provision
- ▶ Other benefits and incentives, such as accident and company health insurance

Pay increases are regulated individually. They take into account the cost of living increase, the general growth of income in the economy, and personal performance. Management remuneration is currently not tied to sustainability-related performance.

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### GRI 2–20: Procedure to determine remuneration

ERFURT's remuneration policy is based on the collective bargaining agreement negotiated by the Rhineland-Westphalian Paper-producing Industry e.V. This is negotiated at regular intervals between the employees' representatives (trade unions) and employers.

Extra-collective remuneration is usually paid to employees whose qualifications or duties justify a higher remuneration than the maximum remuneration level specified in the collective bargaining agreement. Grading / increase of the monthly gross income is regulated individually. This takes into account the cost of living increase, the general growth of income in the economy, and personal performance.

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### GRI 2–24: Inclusion of commitments on principles and practices

Our Code of Conduct and Supplier Code of Conduct call on our employees and business partners to actively support us in implementing our mission and vision. We expect our employees to identify with our ethical principles and to always align their actions to these principles of conduct. Our managers practise our principles in an exemplary manner and ensure that employees understand and comply with the regulations in their area of responsibility.

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### GRI 2–25: Processes to remediate negative impacts

We provide our employees with various ways of reporting possible questions, suggestions, or rule violations, e.g. the central email address [hinweisgeberschutz@sicdata.de](mailto:hinweisgeberschutz@sicdata.de).

We always treat all information confidentially. All reports will be followed up without the whistleblower having to fear consequences. We accept that some information can be clarified directly with the person concerned. In some cases, the manager, the HR department or the Works Council may also be brought in for support.

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### GRI 2–27: Compliance with laws and regulations

All relevant laws, ordinances and regulations are monitored and fully complied with in all business areas of the company to comply with laws.

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## GRI 202: Market presence

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### GRI 202–1: Ratio of standard entry level wage by gender compared to the local minimum wage

The remuneration policy is based on the applicable collective bargaining agreement negotiated with the Rhineland-Westphalia Paper-producing Industry e.V. ERFURT adheres to the principle of equal pay for men and women for identical or equal work and qualifications. With an hourly wage of €18.17 for collective wage agreement group K/T 2 (o), the lowest standard entrance salary, regardless of gender, is approx. 51% above the statutory minimum wage of €12/h.

### GRI 202–2: Proportion of senior management hired from the local community

A proportion of 50% of our management team lives within a radius of less than 10 km and 16% of managers have a journey to work of more than 50 km.

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## GRI 204: Procurement practices

In 2022, we created a Supplier Code of Conduct and communicated it through our corporate website. We plan to send this Code of Conduct directly to our suppliers in 2023. In 2024, certain suppliers intend to sign it to confirm that they will not violate the contents of the Code of Conduct. In 2023, we will also produce a questionnaire to obtain information on the supplier, including raw material countries of origin, and production sites. This will then be sent out in 2024 and completed by our suppliers.

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## GRI 205: Anti-corruption measures

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### GRI 205–2: Communication and training about anti-corruption policies and procedures

All affected employees will regularly participate in our Compliance training course.

### GRI 205–3: Confirmed incidents of corruption and actions taken

There are no confirmed corruption cases in the reporting period.

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## GRI 207: Taxes

ERFURT fulfils its tax obligations within the legal framework. The management is responsible for the management and control of tax positions as well as for complying with legal and internal regulations. Since then, ERFURT has maintained a collaborative relationship with the financial authorities, and always ensures open and transparent communication. Due to the separation of Erfurt & Sohn KG and German Paper Solutions GmbH & Co. KG in terms of postal address, this applies to the Federal Central Office for Taxes and to the public institutions in Schwelm and Wuppertal.

ERFURT is advised by legal and tax advisers who know and understand the individual tax situation of the group thanks to their long-term cooperation. This ensures the best possible compliance with existing and new tax guidelines.

### GRI 207–4: Country-by-country reporting

Country-by-country reporting is not required due to ERFURT's registered office and business activities being in Germany. In order to complete the tax framework applicable to ERFURT, reference is made to the English subsidiary Erfurt UK Ltd. as well as the Swiss site. The two above entities acted as pure sales companies during the reporting period and therefore have direct link to the sector.

ERFURT's holding over Erfurt UK Ltd. 100% of the shares of Retford Wallcoverings Ltd. The former manufacturer of woodchip was acquired in the late 90s and now operates as a manufacturer and distributor of wallcoverings and accessories.

## GRI 302: Energy

### GRI 302-1: Energy consumption within the organisation

Power consumption	Unit	2021	2022	Change
Electricity mix	kWh	20,295,859	18,043,158	- 11.1%
Own power generation from fossil fuels	kWh	5,585,826	4,397,069	- 21.3%
<b>Total</b>	<b>kWh</b>	<b>25,881,685</b>	<b>22,440,227</b>	<b>- 13.3%</b>

Heat generation from fossil fuels	Unit	2021	2022	Change
Natural gas	kWh	81,153,723	19,517,827	- 75.9%
LPG (liquefied natural gas)	kWh	116,960	122,971	+ 5.1%
Lignite dust LEP	kWh	0	44,613,112	+ 100%
<b>Total</b>	<b>kWh</b>	<b>81,270,683</b>	<b>64,253,911</b>	<b>- 20.9%</b>

Business-related mobility with fossil fuels	Unit	2021	2022	Change
Vehicles with a diesel engine	l	104,173	69,001	- 33.8%
Vehicles with petrol engines	l	20,982	24,125	+ 15.0%
<b>Total</b>	<b>l</b>	<b>125,155</b>	<b>93,126</b>	<b>- 25.6%</b>

## GRI 303: Water and effluents

### GRI 303-2: Management of water discharge-related impacts

As far as possible, the process water required is kept within the predominantly closed water cycle and purified in a waste water pre-treatment plant before it is fed into the urban sewer system to the Buchenhofen waste water treatment plant run by the River Wupper Association. The company complies with all legal requirements for effluent discharge at the production sites in accordance with the Waste Water Ordinance. The limit values are controlled by the River Wupper Association at regular intervals with corresponding reporting in accordance with statutory requirements.

### GRI 303-3: Water withdrawal

Water is taken from the River Wupper at natural extraction points and without pumps. The extracted water is fed to the two production plants and the power plants as fresh water after mechanical purification with sand and gravel filters. ERFURT aims to reduce water withdrawal by limiting water consumption during non-production periods, where this is technologically feasible. Groundwater is also extracted via a separate drinking water well and fed into a private drinking water pipeline to supply drinking water to the ERFURT plants and neighbouring factory houses incorporating apartments for plant employees.

Water withdrawal	Unit	2021	2022	Change
River Wupper	m <sup>3</sup> /a	685,512	673,900	- 1.7%
Groundwater	m <sup>3</sup> /a	15,241	17,661	+ 15.9%
<b>Total</b>	<b>m<sup>3</sup>/a</b>	<b>700,753</b>	<b>691,561</b>	<b>- 1.3%</b>

## GRI 303-4: Water discharge

The effluent from the ERFURT production and power plants is generated during the production of paper, wallpaper and heat. The effluent from the paper mill is mechanically pre-purified in an on-site effluent treatment plant. This produces dehydrated, fibrous sludge as a "catch" material, which is stored in a silo and then disposed of as non-hazardous waste.

After recooling to the specified 40 °C, the pre-purified effluent from the power plants is discharged into the City of Wuppertal's urban sewer and fed through the City Of Wuppertal's sewer pipework to the Buchenhofen sewage treatment plant for final clarification. The total amount of effluent from the power plant is measured and documented. The effluent limit values were met in accordance with official requirements in 2022. Only process chemicals with water hazard class (WHC) 1 are used in the paper mill.

Cooling water from wallpaper and paper production can be fed directly back into the River Wupper as continuous cooling water, as no process-related chemical change has taken place.

Water discharge	Unit	2021	2022	Change
Paper mill effluent	m <sup>3</sup> /a	548,186	521,850	- 4,8 %
volume of which designated as flow-through cooling water	m <sup>3</sup> /a	3,673	3,190	- 13,2%
Wallpaper factory effluent (flow-through cooling water)	m <sup>3</sup> /a	55,441	45,400	- 18.1 %
Power plant effluent	m <sup>3</sup> /a	60,429	70,843	+ 17.2%
Drinking water effluent	m <sup>3</sup> /a	15,241	17,661	+ 15.9%
<b>Total</b>	<b>m<sup>3</sup>/a</b>	<b>679,297</b>	<b>655,754</b>	<b>- 3.5%</b>

## GRI 303-5: Water consumption

The water withdrawn from the River Wupper is used in many processes and is specifically needed for paper production.

	Unit	2021	2022	Change
<b>Total water consumption</b>	<b>m<sup>3</sup>/a</b>	<b>641,639</b>	<b>642,971</b>	<b>+ 0.2%</b>

## GRI 304: Biodiversity

In order to improve water continuity, the fish ladder for salmon and eel, which has existed since the 1990s, was adapted to the state of the art in 2021 in cooperation with the River Wupper Association and the state authorities. It was constructed as a trough with a basin structure over a length of approx. 55 m in the direction of flow of the River Wupper. At the same time, the River Wupper Association was granted land rights in order to be able to carry out renaturation measures along the right bank of the River Wupper in the upper reaches of the dam weir. The left bank of the River Wupper is a rocky steep bank and therefore cannot be considered for renaturation. There is a fishing ban across the entire area of the plant in order to protect aquatic life.

### GRI 304-1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

The 8-hectare site on the River Wupper is surrounded by landscape and nature conservation areas and fauna and flora habitats. The production activities result in an adverse impact on the protected areas caused by emissions from the plant, which are reduced by the implementation of officially ordered immission control measures. Emissions are monitored and reported to the competent monitoring authorities.

## GRI 305: Emissions

### GRI 305-1: Direct (Scope 1) GHG emissions

### GRI 305-2: Direct (Scope 2) GHG emissions

### GRI 305-3: Other (Scope 3) indirect GHG emissions

Direct GHG emissions are generated by the heat generated in the power plant. The heat and power plant is a cogeneration plant that generates process heat (steam) as well as electrical energy (steam turbine with generator). A gas boiler system is operated as backup and for low load requirements.

Due to increased energy prices and the threat of gas shortages, a multi-year contract was signed in 2021 for the use of lignite dust as a primary fuel. Natural gas was used for auxiliary firing. The contract runs until 2024 and it is still being decided whether a switch will be made to natural gas from 2025.

Feasibility studies are being carried out to reduce direct GHG emissions in order to find alternatives for heat generation from fossil fuels. It will also examine to what extent fossil fuels can be saved by installing a high-temperature heat storage tank and a power-driven steam generator.

ERFURT's energy target of reducing electricity consumption by 1% annually was achieved in 2021 and 2022.

GHG emissions	Unit	2021	2022	Change
<b>SCOPE 1</b>	<b>t CO<sub>2</sub>e</b>	<b>18,253</b>	<b>22,948</b>	<b>+ 25.7%</b>
Own power generation from fossil energy sources	t CO <sub>2</sub> e	1,482	1,842	+ 24.3%
Heat generation from fossil energy sources	t CO <sub>2</sub> e	16,463	20,878	+ 26.8%
Mobility with fossil fuels	t CO <sub>2</sub> e	308	226	- 26.6%
Electric mobility from self-generated electricity using fossil fuels	t CO <sub>2</sub> e	0	2	+ 100%
<b>SCOPE 2</b>	<b>t CO<sub>2</sub>e</b>	<b>9,126</b>	<b>10,555</b>	<b>+ 15.7%</b>
External power supply	t CO <sub>2</sub> e	9,126	10,555	+ 15.7%
<b>SCOPE 3</b>	<b>t CO<sub>2</sub>e</b>	<b>32,609</b>	<b>36,348</b>	<b>+ 11.5%</b>
Power and heat generation	t CO <sub>2</sub> e	4,455	6,403	+ 43.7%
Mobility, transport and sales	t CO <sub>2</sub> e	2,911	3,488	+ 19.8%
Supply chain processes, process and product materials	t CO <sub>2</sub> e	25,243	26,457	+ 4.8%
<b>Total</b>	<b>t CO<sub>2</sub>e</b>	<b>59,988</b>	<b>69,851</b>	<b>+ 16.4%</b>

### GRI 305-7: Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions

When heat is generated in power plants, the combustion of fossil fuels produces air emissions, such as sulfur oxides, nitrogen oxides and dust. Emissions are below the limits set by the legal and regulatory authorities.

## GRI 306: Waste

### GRI 306-1: Waste generation and significant waste-related impacts

All waste from production is recorded separately and collected separately. If waste cannot be recycled at the plant, the separately recorded waste fractions are taken for proper disposal. Only small quantities of hazardous waste are produced, which are recorded, collected and disposed of separately according to their hazard. By far the largest amount of waste generated is non-hazardous waste.

	Unit	2021	2022
Hazardous waste for disposal	t/a	34	6
Hazardous waste for recycling	t/a	-	2
Non-hazardous waste for disposal	t/a	856	604
Non-hazardous waste for recycling	t/a	4,560	4,750



### GRI 306–3: Waste generated

	Unit	2021	2022
Adhesive and sealant waste	t	–	–
Machine, gear, and lubricating oils	t	–	2.43
Oily water from oil/water separators	t	27.30	1.50
Waste mixtures from sand traps, oil and water separators	t	6.50	–
Paper and cardboard packaging	t	–	14.17
Plastic packaging	t	22.18	39.14
Wooden packaging	t	54.91	54.48
Mixed packaging	t	67.35	62.54
Packaging containing hazardous residues	t	–	2.73
Absorbent and filter materials containing remains of hazardous substances	t	–	1.62
Concrete	t	59.65	58.58
Tiles and ceramics	t	9.36	–
Mixtures of concrete, bricks, tiles and ceramics	t	481.74	135.81
Wood	t	–	–
Bitumen mixtures	t	5.44	–
Iron and steel	t	60.10	60.81
Mixed metals	t	26.18	35.04
Cables	t	–	6.44
Soil and stones	t	–	32.2
Gypsum-based construction materials	t	4.82	–
Mixed construction and demolition waste	t	45.26	49.42
Paper and cardboard	t	147.6	101.45
Fluorescent tubes	t	0.14	0.234
Biodegradable waste	t	271.58	218.10
Biodegradable kitchen and canteen waste	t	0.36	2.04
"Catch" material	t/a	3,859.00	4,122.00
"Spittle" material	t/a	271.10	362.00

In the industrial waste sector, the "catch" material (Waste Catalogue Ordinance AVV no. 030310) collected from physical-mechanical pre-treatment in the waste water treatment plant of the paper mill represents the largest waste fraction. This dehydrated, fibrous sludge is stored in a silo and then disposed of as non-hazardous waste. The aim is to reduce the "catch" material collected to less than 150 kg/t paper.

The second largest waste fraction in the industrial waste sector is the "spittle" (Waste Catalogue Ordinance AVV no. 030307) that occurs during mechanical cleaning of the material suspension in the material preparation section of the paper mill. It is essentially composed of impurities from the recycled paper used, which are separated from the material suspension during material preparation for paper production. These are primarily metal and plastic particles that are collected in containers and sent for disposal.

In the industrial waste sector, waste fractions are recorded separately in accordance with the Commercial Waste Ordinance GewAbfV. The metals are collected according to type, so that the waste fractions can be disposed of with greater homogeneity. The aim is to reduce residual waste to less than 66 t/annum.

### GRI 306–4: Waste diverted from disposal

Dry paper waste from paper production and packaging is returned to the production process. By investing in material processing plants, in particular in material separators, wet-resistant papers can also be re-processed in paper production in such a way that they can be used for the production of paper. ERFURT's own paper waste is therefore not sent for waste collection and disposal, but instead is re-integrated into paper production as a raw material.

### GRI 306–5: Waste directed to disposal

Waste disposal is carried out in cooperation with reliable and certified waste disposal companies.

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## GRI 402: Labour/management relations

ERFURT employees are represented by the Works Council. According to the Industrial Relations Act BetrVG, employees are notified in good time and comprehensively that they have the right to obtain advice and, if necessary, safeguard their interests. Further rights, including the conclusion of company agreements, reconciliation of interests, social plan or similar, are also taken into consideration. A change will only take place after the proper implementation of this participation procedure and in compliance with the agreements made with the Works Council.

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## GRI 403: Occupational health and safety

In addition to the quality of our products and economic success, the health and safety of our workforce is an equally important corporate objective. At ERFURT, our focus is on providing a healthy and safe working environment. Therefore, ERFURT has had a company health management system, the ERFURT Health Initiative (EGI), since 2014. We comply with all applicable legal regulations governing health at work, workplace ergonomics, and occupational safety. We pursue a systematic occupational health and safety policy with the aim of avoiding accidents and occupational sickness.

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### GRI 403-1: Occupational health and safety management system

Occupational health and safety management is part of the integrated management system. Explicit certification according to ISO 45001 is not required at this time. Occupational health and safety management is based on the recommendations and specifications of the Employers' Liability Insurance Association for Raw Materials and the Chemical Industry.

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### GRI 403-2: Hazard identification, risk assessment, and incident investigation

There are two Occupational Safety Officers in the production plants and a joint Occupational Safety Committee in accordance with the German Act on Occupational Physicians, Safety Engineers and Other Occupational Safety Specialists ASiG. In addition, an external Fire Safety Officer has been appointed; the internal fire detection and extinguishing system is supervised by trained personnel. First responders and safety officers have been appointed and trained in the departments in accordance with Employers' Liability Insurance Association regulations. An occupational health practitioner has also been appointed to look after the preventative health care of our employees. Some company paramedics have been trained in addition to the first responders.

In order to prevent health and accident hazards, all workplaces are visited at regular intervals by the responsible personnel (Occupational Safety Officers, occupational health practitioners, Works Council, and department managers). The evaluation of working conditions is supported by the systematic measurement of noise, dust/particles, room temperatures and lighting. If necessary, measures for improvement will be decided and implemented.

Occupational Health and Safety Officers are involved at an early stage in projects involving the set-up of new systems and machinery. This ensures that the occupational health and safety of employees can be taken into account from the outset in planning. Risk assessments are done during the planning phase or during the set-up of new systems and machinery. Employees are instructed on the hazards of systems and machinery before they are put into operation and are trained in the accident prevention regulations to be complied with.

Hazard assessments are based on the Hazard Catalogue A017 published by the German Employers' Liability Insurance Association for Raw Materials and the Chemical Industry as well as the checklists and forms based on them. In addition, ergonomic and mental stress is identified, documented and avoidance or preventative measures are developed and implemented. Divisional and department managers are encouraged to check hazard assessments at least annually and, if necessary, adapt them. The aim is to produce and maintain risk assessments in a standardised digital format.

Accident data is collected and evaluated, and discussed in regular meetings and in Occupational Health and Safety Committee meetings. Every accident is analysed in terms of its cause and origin. We then derive additional technical safety measures or clarify work instructions for prevention purposes. Our goal is to reduce the number of days lost due to work and transport accidents through extensive training.

### GRI 403–3: Occupational health services

A company doctor is available as a reliable contact person with extensive practical experience and in-depth knowledge of our staff on a regular basis, both in person and by phone. Occupational health care is intended to prevent possible work-related illnesses at an early stage. It is also used to determine whether there is an increased health risk when undertaking particular work.

### GRI 403–4: Worker participation, consultation, and communication on occupational health and safety

Four meetings of the Occupational Health and Safety Committee are held every year in accordance with the German Act on Occupational Physicians, Safety Engineers and Other Occupational Safety Specialists ASiG. The management, Occupational Safety Officers, Chair and other representatives of the Works Council, divisional Safety Officers and representatives from Human Resources and Purchasing are all involved. The meetings deal with occupational health and safety issues and define improvement measures. An invitation with the agenda is usually sent out electronically 1 week before the meeting. The members of the committee may add further items to the agenda or raise them during the meeting.

The project groups meet at regular intervals in order to jointly compile and evaluate internal, but also overarching, factors at the workplace. Based on these evaluations, measures can be defined which are implemented in the departments after consultation with the supervisors.

### GRI 403–5: Worker training on occupational health and safety

Employees are instructed about the hazards at the workplace at least once every calendar year and participation in these training sessions is documented. Since 2022, repeat instruction has been given using the iManSys tool supplied by Domeba complete with electronic participation documentation. If necessary, training and instruction will be conducted several times in the calendar year. Specifically after operationally significant events, employees will be instructed about the respective event with its potential danger, origin and avoidance. The aim is to expand electronic training by expanding the iManSys e-learning tool.

### GRI 403–6: Promotion of worker health

In addition, various action events and talks on health are held regularly, as well as a company health insurance scheme for the management team.

### GRI 403–8: Workers covered by an occupational health and safety management system

All ERFURT employees are covered by occupational health and safety scheme.

<b>Erfurt &amp; Sohn KG</b>	<b>Unit</b>	<b>2021</b>	<b>2022</b>
Employees	FTE		99
Commercial employees	FTE		98.5
Apprentices	FTE		19.75
<b>gps GmbH &amp; Co.KG</b>	<b>Unit</b>	<b>2021</b>	<b>2022</b>
Employees	FTE		26.75
Commercial employees	FTE		79.75

### GRI 403–9: Work-related injuries

<b>Accidents</b>	<b>Unit</b>	<b>2021</b>	<b>2022</b>
Reportable accidents	Number	10	6
Non-reportable accidents	Number	6	6
<b>Road accidents</b>	<b>Unit</b>	<b>2021</b>	<b>2022</b>
Reportable road accidents	Number	2	3
Non-reportable road accidents	Number	–	–

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## GRI 403–10: Work-related ill health

The most common occupational disease is noise-related hearing loss. This concerns almost exclusively older employees, who have for the most part moved to ERFURT from other companies. Noise protection measures have already been successfully implemented at various points in the company, e.g. sound-protected control rooms, installation of silencers in vacuum systems, use of sound-insulated motors/transmissions and replacement of gear drives by synchronous/towing drives. In the administration area, street-side windows have been replaced by new soundproofed windows. Our aim is to address noise and noise mitigation issues more intensively with instruction and training events.

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## GRI 407: Freedom of association and collective bargaining

At ERFURT, a close and trusting working relationship with employee representatives is an essential component and proven cornerstone of our company policy. An open and constructive dialogue, shaped by mutual respect, forms the basis of mutual trust and cooperative working relationships. ERFURT does not have an increased risk of restrictions regarding the right to freedom of association and collective bargaining.

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## GRI 408: Child labour

### GRI 408–1: Operations and suppliers at significant risk for incidents of child labour

There is no risk of child labour at ERFURT. There are no known violations of the ban on child labour.

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## GRI 409: Forced or compulsory labour

### GRI 409–1: Operations and suppliers at significant risk for incidents of forced or compulsory labour

There is no risk of forced or compulsory labour at ERFURT. There are no known violations of the ban on forced or compulsory labour.

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## GRI 410: Security practices

ERFURT employs security personnel who regularly conduct plant tours and check trucks. Personnel are trained to behave in emergency situations.

### GRI 410–1: Security personnel have been trained in human rights policies and procedures

Security personnel have been trained in the Code of Conduct, which includes human rights. Separate training on human rights policy and procedures will not be provided.

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## GRI 413: Local communities

ERFURT is in regular dialogue with the River Wupper Association and other organisations. There is also a direct link to the Wilhelm Erfurt Foundation, which was founded by Wilhelm Erfurt and is committed to environmental and social issues in the town of Schwelm. The foundation particularly promotes reforestation and the renaturation of rivers. In its social work, the foundation funds musical education for children and supports projects in schools.

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## GRI 417: Marketing and labelling

In its communication, ERFURT attaches great importance to transparency and credibility, as well as to compliance with all legal regulations.

The use of certificates and quality labels with a high degree of awareness underpins product promises relating to health, sustainability and quality. Interested parties can read the test criteria for the quality seals and certificates on the providers' websites. The corresponding certificates can be viewed on the ERFURT website and downloaded if required.

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## GRI 418: Customer privacy

In principle, ERFURT treats personal data as confidential and complies with the legally applicable requirements (EU GDPR). ERFURT protects the personal data of employees, customers, suppliers, applicants, and other data subjects.

We collect, gather, process, use and store personal data only in accordance with the respective legal requirements and our Privacy Policy. We take appropriate and suitable technical and organisational measures to protect existing data from unauthorised access, impermissible use, misuse or loss.

# GRI CONTENT INDEX

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GENERAL INFORMATION</b>			
<b>GRI 2 THE ORGANISATION AND ITS REPORTING PRACTICES</b>			
2-1	Organisational profile	P. 12-14, 58	
2-2	Entities included in the organisation's sustainability reporting	P. 58	
2-3	Reporting period, frequency and contact point	P. 58	
2-4	Correction or new presentation of information	P. 58	
2-5	External review	P. 58	
2-6	Activities, value chain and other business relationships	P. 16-21 P. 41	
2-7	Employees	P. 59	
2-8	Workers who are not employees	P. 59	
2-9	Governance structure and composition	P. 31	
2-10	Nomination and selection of the highest governance body		Information not available/incomplete
2-11	Chair of the highest governance body	P. 59	
2-12	Role of the highest governance body in overseeing the management of impacts	P. 59	
2-13	Delegation of responsibility for managing impacts		Information not available/incomplete

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
2-14	Role of the highest governance body in sustainability reporting	P. 59	
2-15	Conflicts of interest	P. 59	
2-16	Communication of critical concerns	P. 60	see GRI 2-25
2-17	Collective knowledge of the highest governance body	P. 59	
2-18	Evaluation of the performance of the highest governance body	P. 60	
2-19	Remuneration policies	P. 60	
2-20	Procedure to determine remuneration	P. 60	
2-21	Annual total compensation ratio		Confidentiality restrictions
2-22	Statement on sustainable development strategy	P. 18-19, 28-29	
2-23	Policy commitments	P. 15 P. 30	
2-24	Inclusion of commitments on principles and practices	P. 60	
2-25	Processes to remediate negative impacts	P. 60	
2-26	Mechanisms for seeking advice and raising concerns	P. 60	Advisory Board (see GRI 2-18) and Employee reporting procedure (see GRI 2-25)
2-27	Compliance with laws and regulations	P. 60	
2-28	Membership in associations and interest groups	P. 20	
2-29	Approach to stakeholder engagement	P. 26	
2-30	Collective bargaining agreements	P. 60	see GRI 2-20

Material issues     Important issues

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>MATERIAL ISSUES</b>			
<b>GRI 3 MATERIAL ISSUES</b>			
3-1	Process to determine material topics	P. 26	
3-2	List of material topics	P. 27	
3-3	Management of material topics	P. 28	
<b>GRI 201 ECONOMIC PERFORMANCE</b>			
3-3	Management of material topics		Confidentiality restrictions
201-1	Directly generated and distributed economic value		Confidentiality restrictions
202-2	Financial consequences of climate change for the organisation and other risks and opportunities associated with climate change		Confidentiality restrictions
202-3	Liabilities for performance-based pension plans and other pension plans		Confidentiality restrictions
202-4	Financial support from the public sector		Confidentiality restrictions
<b>GRI 202 MARKET PRESENCE</b>			
3-3	Management of material topics		Information not available/incomplete
202-1	Ratio of standard entry level wage by gender compared to the local minimum wage	P. 61	
202-2	Proportion of senior management hired from the local community	P. 61	

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 203 INDIRECT ECONOMIC IMPACTS</b>			
3-3	Management of material topics		Not applicable
203-1	Infrastructure investments and services supported		Not applicable
203-2	Significant indirect economic impacts		Not applicable
<b>GRI 204 PROCUREMENT PRACTICES</b>			
3-3	Management of material topics	<b>U B W S Z</b> P. 37, 40, 52, 61	
204-1	Proportion of spending on local suppliers	<b>S</b> P. 40	
<b>GRI 205 ANTI-CORRUPTION MEASURES</b>			
3-3	Management of material topics	<b>U</b> P. 30	The Code of Conduct applies (p.30)
205-1	Operations assessed for risks related to corruption		Information not available/incomplete
205-2	Communication and training about anti-corruption policies and procedures	<b>U</b> P. 61	
205-3	Confirmed incidents of corruption and actions taken	<b>U</b> P. 61	The Code of Conduct applies (p.30)
<b>GRI 206 ANTI-COMPETITIVE BEHAVIOUR</b>			
3-3	Management of material topics	<b>U</b> P. 30	The Code of Conduct applies (p.30)
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	<b>U</b>	No legal proceedings

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 207 TAXES</b>			
3-3	Management of material topics	P. 61	
207-1	Tax concept		Information not available/incomplete
207-2	Tax governance, control and risk management		Information not available/incomplete
207-3	Stakeholder engagement and management concerns related to tax		Information not available/incomplete
207-4	Country-by-country reporting	P. 61 f.	
<b>GRI 301 MATERIALS</b>			
3-3	Management of material topics	P. 42-45, 50-53	
301-1	Materials used by weight or volume		Confidentiality restrictions
301-2	Recycled input materials used		Confidentiality restrictions
301-3	Reclaimed products and their packaging materials		Confidentiality restrictions
<b>GRI 302 ENERGY</b>			
3-3	Management of material topics	P. 48	
302-1	Energy consumption within the organisation	P. 62	
302-2	Energy consumption outside of the organisation		Information not available/incomplete
302-3	Energy intensity		Confidentiality restrictions
302-4	Reduction of energy consumption	P. 49	
302-5	Reductions in energy requirements of products and services	P. 49	

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 303 WATER AND EFFLUENTS</b>			
3-3	Management of material topics	P. 34-35	
303-1	Water as a shared resource	P. 34	
303-2	Management of water discharge-related impacts	P. 62	
303-3	Water withdrawal	P. 62	
303-4	Water discharge	P. 63	
303-5	Water consumption	P. 63	
<b>GRI 304 BIODIVERSITY</b>			
3-3	Management of material topics	P. 36-37	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	P. 63	
304-2	Significant impact of activities, products and services on biodiversity		Not applicable
304-3	Habitats protected or restored	P. 36	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		Not applicable
<b>GRI 305 EMISSIONS</b>			
3-3	Management of material topics	P. 46-48	
305-1	Direct (Scope 1) GHG emissions	P. 63 f.	

Material issues    Important issues



GRI Standard		Transformation areas	Reference	Comment / Omission Justification & explanation
305-2	Energy indirect (Scope 2) GHG emissions	D	P. 63 f.	
305-3	Other indirect (Scope 3) GHG emissions	D	P. 63 f.	
305-4	Intensity of GHG emissions	D		Confidentiality restrictions
305-5	Reduction of GHG emissions	D	P. 46-48	
305-6	Emissions of ozone-depleting substances (ODS)	D		Not applicable
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	D	P. 64	
<b>GRI 306 WASTE</b>				
3-3	Management of material topics	Z	P. 50-53	
306-1	Waste generation and significant waste-related impacts	Z	P. 64	
306-2	Management of significant waste-related impacts	Z		Not applicable
306-3	Waste generated	Z	P. 65	
306-4	Waste diverted from disposal	Z	P. 65	
306-5	Waste directed to disposal	Z	P. 65	
<b>GRI 307 SUPPLIER ENVIRONMENTAL ASSESSMENT</b>				
3-3	Management of material topics	B W	P. 37	
308-1	New suppliers that were screened using environmental criteria	B W		Not applicable Evaluation of key suppliers is planned
308-2	Negative environmental impact in the supply chain and actions taken	B W		Not applicable
<b>GRI 401 EMPLOYMENT</b>				
3-3	Management of material topics	U S	P. 38-39	

GRI Standard		Transformation areas	Reference	Comment / Omission Justification & explanation
401-1	New employee hires and employee turnover	U S		Information not available/incomplete
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	U S		Information not available/incomplete
401-3	Parental leave	U S		Information not available/incomplete
<b>GRI 402 LABOUR/MANAGEMENT RELATIONS</b>				
3-3	Management of material topics	U S	P. 66	
402-1	Minimum notice period for operational changes	U S		Information not available/incomplete
<b>GRI 403 OCCUPATIONAL HEALTH AND SAFETY</b>				
3-3	Management of material topics	S	P. 66	
403-1	Occupational health and safety management system	S	P. 66	
403-2	Hazard identification, risk assessment, and incident investigation	S	P. 66	
403-3	Occupational health services	S	P. 67	
403-4	Worker participation, consultation, and communication on occupational health and safety	S	P. 67	
403-5	Worker training on occupational health and safety	S	P. 67	
403-6	Promotion of worker health	S	P. 39, 67	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	S		Not applicable
403-8	Workers covered by an occupational health and safety management system	S	P. 67	

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
403-9	Work-related injuries	P. 67	
403-10	Work-related ill health	P. 68	
<b>GRI 404 EDUCATION AND TRAINING</b>			
3-3	Management of material topics	P. 32	
404-1	Average number of hours of training and further education per year per employee		Information not available/incomplete
404-2	Programs for upgrading employee skills and transition assistance programs		Information not available/incomplete
404-3	Percentage of employees receiving regular performance and career development reviews		Information not available/incomplete
<b>GRI 405 DIVERSITY AND EQUAL OPPORTUNITIES</b>			
3-3	Management of material topics	P. 38	
405-1	Diversity of governance bodies and employees	P. 59	see GRI 2-7
405-2	Ratio of basic salary and remuneration of women to men		Information not available/incomplete
<b>GRI 406 NON-DISCRIMINATION</b>			
3-3	Management of material topics	P. 30	The Code of Conduct applies (p.30)
406-1	Incidents of discrimination and corrective actions taken		No incidents
<b>GRI 407 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</b>			
3-3	Management of material topics	P. 68	The Code of Conduct applies (p.30)
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		Information not available/incomplete

GRI Standard	Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 408 CHILD LABOUR</b>			
3-3	Management of material topics	P. 30, 40	The Code of Conduct (p.30) and the Supplier Code of Conduct (p.40) apply
408-1	Operations and suppliers at significant risk for incidents of child labour	P. 68	
<b>GRI 409 FORCED OR COMPULSORY LABOUR</b>			
3-3	Management of material topics	P. 30, 40	The Code of Conduct (p.30) and the Supplier Code of Conduct (p.40) apply
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	P. 68	
<b>GRI 410 SECURITY PRACTICES</b>			
3-3	Management of material topics	P. 68	
410-1	Security personnel have been trained in human rights policies and procedures	P. 68	
<b>GRI 411 RIGHTS OF INDIGENOUS PEOPLE</b>			
3-3	Management of material topics		Not applicable
411-1	Incidents of violations involving the rights of indigenous peoples		Not applicable
<b>GRI 413 LOCAL COMMUNITIES</b>			
3-3	Management of material topics	P. 68	
413-1	Operations with local community engagement, impact assessments, and development programs		Information not available/incomplete
413-2	Operations with significant actual and potential negative impacts on local communities		Not applicable

Material issues    Important issues

GRI Standard		Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 414</b>	<b>SUPPLIER SOCIAL ASSESSMENT</b>			
3-3	Management of material topics	S	P. 40	
414-1	New suppliers that were screened using social criteria	S		Not applicable Evaluation of key suppliers is planned
414-2	Negative social impact in the supply chain and actions taken			Not applicable
<b>GRI 415</b>	<b>PUBLIC POLICY</b>			
3-3	Management of material topics			Not applicable
415-1	Party donations			Not applicable
<b>GRI 416</b>	<b>CUSTOMER HEALTH AND SAFETY</b>			
3-3	Management of material topics	M	P. 42-45	
416-1	Assessment of the health and safety impacts of product and service categories	M	P. 44	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services			Not applicable No violations
<b>GRI 417</b>	<b>MARKETING AND LABELLING</b>			
3-3	Management of material topics	U	P. 69	
417-1	Requirements for product and service information and labelling	U		All legal regulations are complied with
417-2	Incidents of non-compliance concerning product and service information and labelling	U		Not applicable No violations
417-3	Incidents of non-compliance concerning marketing communications	U		Not applicable No violations

GRI Standard		Transformation areas	Reference	Comment / Omission Justification & explanation
<b>GRI 418</b>	<b>CUSTOMER PRIVACY</b>			
3-3	Management of the topic	U	P. 69	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	U		Not applicable No violations

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