

2022

# DPEF

Non-financial  
Performance  
Declaration



EXACOMPTA CLAIREFONTAINE



# FOREWORD

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This document sets out the way in which the Exacompta Clairefontaine Group takes account of the societal, social and environmental impacts of its activities.

This statement of non-financial performance (*Déclaration de Performance Extra-Financière* or *DPEF* in French) is an integral part of the management report. The reporting period covers the year 2022 (1 January to 31 December), during which the Group generated revenue of €835,604,000.

All the Group's activities are included within the scope of this statement, albeit with a particular focus placed on paper production operations, the business line to which the majority of the environmental impacts correspond.

Raynard ceased operations in March 2023. It was therefore not possible to gather information representing 2022 for the site. Furthermore, other entities were unable to provide all required data on time or could provide only partial data. However, this does not impact the overall quality of this report.

In 2022, the Group acquired:

- **The Clay and Paint Factory**, manufacturer of paints, dyes, varnishes and modelling clay;
- **J. BLOCKX Fils**, producer of oil paints, watercolours, pastels, pigments and auxiliaries.

Data on these sites will start to be included in the statement of non-financial performance issued for the year 2023.

The Group encourages measures designed to promote responsible food choices, prevent food insecurity and improve animal welfare, although it does not have direct responsibilities in these areas. These issues are therefore excluded from this report, These measures could not be implemented in 2022. However, from 2023, Exacompta Clairefontaine wants its subsidiaries to take action to promote the practice of physical activities and sports.

For the French part of the Group, in companies with more than 11 employees, the social and economic committee (SEC) is the staff representative body.

For a number of years, dialogue with social partners, in particular trade union representatives, has enabled the conclusion and implementation of collective agreements in order to ensure that good working conditions and equal treatment continue to prevail.

At 31 December 2022, 126 agreements in force were recorded relating to issues including salary, working hours, health scheme funding and professional gender equality.

Site managers are responsible for implementing Group policy to ensure that their activities guarantee employee health and safety, help preserve the environment and promote regional development.

Preserving all forms of biodiversity is a major issue, serving human beings, including through:

- supply services (food, fresh water, building materials, pharmaceutical ingredients, fuel, etc.)
- regulating services (climate, erosion, diseases, pollination, etc.)
- cultural services (leisure and tourism, inspiration, education, ethical and spiritual values).

As a user of these services, the Exacompta Clairefontaine Group is committed to contributing to the preservation of biodiversity. Various measures in this area are highlighted in this report.

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# GROUP PRESENTATION

The Exacompta Clairefontaine Group engages in both the production and processing of paper, enabling it to control the quality of its products at each stage of the manufacturing process.

Its guiding principle is “make what you sell and sell what you make”. Apart from a few exceptions, the Group does not engage in resale or contract manufacturing.

Its strength lies in its reliance on iconic brands to win the loyalty of consumers and businesses through the Group’s quality policy.

## PRINCIPAL BUSINESS ACTIVITIES

### PRINTING AND WRITING PAPERS

**Papeteries de Clairefontaine** has manufactured printing and writing papers since 1858. With five machines operated across four sites, the Group produced around 292,000 tonnes in 2022 (gross tonnage). The qualitative positioning of these papers intended for office use, printing and the manufacture of stationery and filing items is overwhelmingly high-end.



*Since 2008, the consumption of paper and stationery has fallen due to the development of digital methods for recording and transferring data, as well as environmental campaigning.*

The main raw materials used by **Clairefontaine**, **Mandeure** and **Schut** consist of virgin or recycled pulp sourced on the world market. For its part, **Everbal** employs technology that enables it to produce on average 100 kg of paper from 106 kg of waste paper.



*The Group’s papers compete with those produced by the large manufacturers who also produce their own pulp. These manufacturers have a structural advantage in terms of cost price and are not affected by fluctuations in commercial pulp prices.*

### STATIONERY

Production began in the late 19th century at **Papeteries de Clairefontaine** and in 1930 at **Exacompta**. This activity accounts for over 62% of the combined revenue of these two business sectors, making it a European leader in this field.

From notebooks, notepads, prints, envelopes, registers and diaries, production has extended in the last 30 years to include filing items, fine art and craft accessories and calendars. The Group's expertise also facilitates a service offering in printing.

Since 2014, the Group has worked to diversify its offer through the development of digital photos and associated services through the acquisition of **Photoweb**, **Invaders Corp (Lalalab)** and, most recently, **Fizzer**. It became a major player in the wrapping paper segment with the acquisition of **Eurowrap** in 2019. In 2022, the group continued its development in the crafts sector by taking over **The Clay and Paint Factory** and **J. Blockx Fils**, two Belgian companies mainly specialising in the manufacture of paints.



*A significant proportion of stationery purchases are seasonal, resulting in variable costs for workshops and overstock that is costly in terms of space and cash flow.*

## MARKETS

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The Exacompta Clairefontaine Group's customers are paper resellers, printers and processing firms, office suppliers, retailers and supermarkets. This sales activity is confined to the papers and stationery produced by the Group. The Group does not sell its products directly to consumers, with the exception of digital photography products.



*To maintain operations in the workshops whilst meeting customer requirements, it is necessary to manufacture an increasing number of product references, of which the Group now lists more than 20,000. Cost-effective production series are decreasing, leading to an increase in the cost price.*

With regard to businesses and consumers, the Group prioritises the sale of products bearing its own brands, of which the best known cover multiple product categories such as:

- **Clairefontaine** - papers, notebooks, envelopes, fine art accessories;
- **Exacompta** - registers, snap-out sets, office articles and filing items.

Similarly, the **Quo Vadis** range of diaries and the **Rhodia** range of notepads are increasingly extensive.



## INDUSTRIAL ASSETS

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Quality is the backbone of the Group's paper production business and the factor that guarantees the long-term viability of its products, whether unprocessed paper sold in reels or reams or paper transformed into stationery at its own workshops with the same high standards.

Over the last three years, the Group has invested an average of €34 million per year (4-5% of consolidated revenue) in the development and/or renewal of its production, processing and distribution equipment.

In France, it engages in the skills development of its workforce with at least 1% of payroll allocated to continuous training.

Its research and development policy has a specific focus on the uniformity, brightness and coating of paper used for printing or specialised packaging. Multiple tests are carried out on the five machines each year. The use of recycled fibres is a priority. The Group is also engaged in the development of new ranges of paper.

With regard to stationery, one of the workshops develops specialised equipment, while the design studios create innovative products. Finally, the **Photoweb** laboratory has cutting-edge customised digital applications.

## COMMERCIAL ASSETS

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Consumers are loyal to the Group's brands, which are a mark of the high quality of the products on which they appear. Effective communication campaigns further promote brand awareness. They account for around 2.4% of the Group's consolidated revenue.

The Group manages sales networks dedicated exclusively to the sale of stationery and papers to supermarkets and stationery stores. The Group's various departments employ sales delegates for visiting key accounts.

Exacompta Clairefontaine also has an online store, **Exaclair Shop**, dedicated to listed resellers.

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**EXACLAIR** *Shop*

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The Group owns six high-performance logistics platforms supporting delivery to its customers throughout Western Europe:

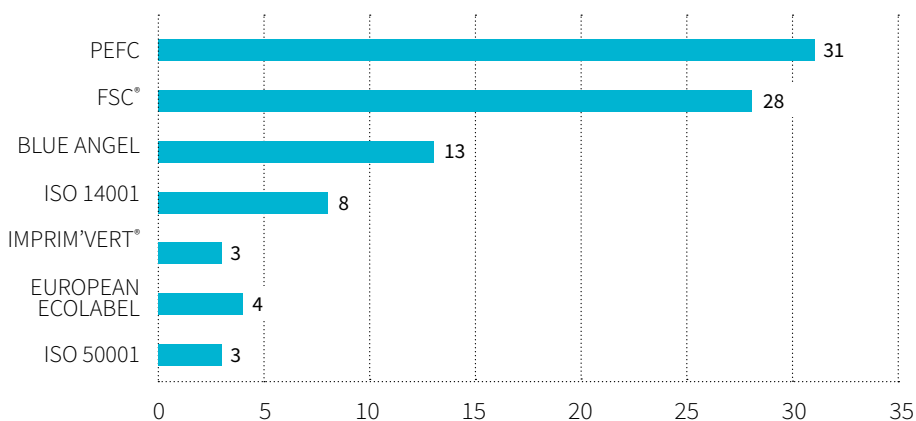
- Vémars (northern Paris) - **Exacompta**,
- Ottmarsheim (Alsace) - **Clairefontaine Rhodia**,
- Etival-Clairefontaine (Vosges) - **Papeteries de Clairefontaine**,
- Carquefou (Loire-Atlantique) - **Quo Vadis**,
- Wizernes (Pas-de-Calais) - **Papeteries Sill** for distribution to supermarkets and hypermarkets,
- Autrèche (Indre-et-Loire) - **Cogir** for shipping products to cafés, hotels and restaurants.

## ENVIRONMENTAL ASSETS

Special attention is paid to protecting the environment. In addition to compliance with regulatory obligations, a number of Group sites have obtained environmental certification:

- FSC® and PEFC: chain of custody for the use of cellulose fibres from sustainably managed forests;
- Blue Angel: use of recycled plastic or fibrous materials limiting the use of dangerous substances;
- European Ecolabel: limiting water and atmospheric emissions in production, restricting the use of dangerous substances and greater energy efficiency;
- Imprim'Vert®, ISO 14001, ISO 50001: implementation of a structure to improve overall environmental production at its sites.

***Number of certified sites by standard***



*A number of costs borne by the Group have a negative impact on it vis-à-vis its European competitors. For example, for the year 2022, **Papeteries de Clairefontaine** paid over €1.7 million to the extended producer responsibility (EPR) scheme as a seller of graphic paper on the market. This mandatory contribution does not exist in any other European country and foreign producers selling in France pass the cost on to distributors.*

## A LONG-TERM POLICY

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Etablissements Charles Nusse SA holds more than 80% of the capital of Exacompta Clairefontaine. The family holding company manages and controls the Group, enabling it to set a consistent long-term policy.

In a capital-intensive industry, on average the Group posts around three quarters of its consolidated earnings to reserves. Despite having a satisfactory cash flow situation, major internal and external investments are financed by long-term loans.

Exacompta Clairefontaine has a policy of fully owning all its subsidiaries, whether direct or indirect, in order to avoid the involvement of minority interests.

The Group is decentralised, with its five departments run by managers who share the same values and are capable of making quick decisions in line with the global policy.

With more than 160 years of history, the decisions taken thus far are testimony to the relevance of its strategic guidelines, which take particular account of its societal, social and environmental responsibilities.

However, this does not stop the Exacompta Clairefontaine Group from approaching the issues described below as challenges to be met in order to safeguard its long-term viability:

- consumer trends and the increasing importance of digital technology, recently compounded by the COVID-19 pandemic,
- sustainable forest management, in terms of the use of resources, the preservation of biodiversity and support for the local population,
- the significant amount of energy consumed by paper production operations at a time when energy and climate transition is becoming increasingly important,
- the need to enhance control of water consumption and improve wastewater quality,
- safeguarding employee health and safety and managing and developing employee skills.

These priority issues have been identified through a combination of:

- industry studies,
- benchmark studies conducted on identified best practices,
- industry questionnaires prepared by stakeholders (in particular the WWF),
- the support of an independent expert.

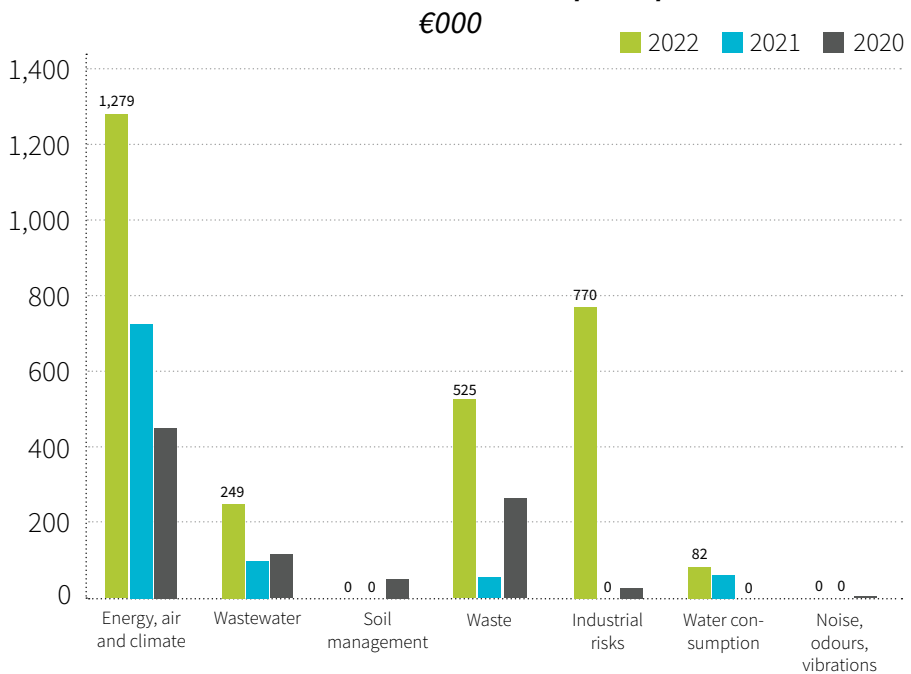
# ENVIRONMENTAL INFORMATION



# INVESTMENTS LIMITING ENVIRONMENTAL IMPACT

Each year, the Group invests in improving the environmental performance of its plants and supports a number of initiatives aiming to reduce its environmental impact. In 2022, the Group's main environmental investments amounted to €2,910,000. Over the last three years, the proportion of expenditure allocated to energy-saving measures has increased sharply. In 2022, it accounted for 44% of total investment. This highlights the Group's commitment to reducing its greenhouse gas emissions in order to protect the climate.

## ***Breakdown of investments per topic***



2022 case studies:

- energy savings and reduction of atmospheric emissions
  - **Falken**: use of 100% green power;
  - **Papeteries de Clairefontaine**: installation of variable speed drives on a vacuum pump, simplification of the pulp circuit to reduce load losses during refining;
  - **CFR**: replacement and insulation of part of the production workshop's roof;
  - **Claircell, CFR, Papeteries de Clairefontaine, Exacompta, Falken, Quo Vadis, Lavigne, Exclair UK**: replacement of old-generation lighting with LED;
  - **Papeteries Sill, Papeteries de Clairefontaine, Lavigne**: replacement of doors and windows;
  - **Lavigne**: external insulation of offices and replacement of the heating system;
  - **Photoweb**: conduct of Eco-Flux (energy, materials, waste, water) and Decarbon'Action (greenhouse gas) diagnoses;

- **Papeterie de Mandeure:** purchase of a variable speed compressor and calorie recovery, cleaning of heat exchangers, installation of divisional electricity meters to monitor consumption more accurately;
  - **Exaclair UK:** replacement of air conditioning units with more efficient appliances, use of hybrid or electric company vehicles;
  - **Papeteries Sill:** replacement of dust extractor filter bags in order to reuse the filtered air to heat the manufacturing workshop;
- wastewater treatment
    - **Everbal:** installation of slow aeration turbines on a process water treatment lagoon;
    - **Papeterie de Mandeure:** automatic recirculation of effluents in case of an incident, installation of a recirculation pump to redirect pulp purification rejects to the pulper in order to reduce the amount of sludge and COD generated;
    - **Schut:** optimisation of the polymer preparation plant to reduce the suspended matter content in discharged water;
- waste management
    - **Exacompta, Rainex, Manuclass, Papeteries Sill, Papeteries de Clairefontaine:** purchase of baling pressers to reduce the volume of waste, streamline transport and facilitate recycling;
    - **AFA:** separation of dust flows and trimmings and installation of a briquette press to compact dust;
    - **Rainex, Papeterie de Clairefontaine:** purchase of an unwinder and a guillotine to make better use of the base of paper reels;
    - **Papeteries de Clairefontaine:** installation of an automated reel conveying line so as to minimise scraps due to handling;
- water consumption
    - **Papeteries de Clairefontaine:** during the severe drought period, rental of a refrigeration unit, two exchangers and testing of the reuse of water at the outlet of the treatment plant in order to reduce water abstraction from the river;
    - **Photoweb:** implementation of divisional meters to ensure better monitoring of consumption;
- landscape and biodiversity
    - **Claircell, Lavigne:** tree planting;



*Papeteries de Clairefontaine - refrigeration unit and heat exchangers*

• industrial risks

- **Claircell, Exacompta, Papeteries Sill, Papeterie de Mandœuvre:** initial installation or extension of automatic fire extinguishing systems.

## FINANCIAL PROVISIONS AND GUARANTEES

Since 1 July 2014, two of the Group's French paper mills have been required to provide financial guarantees for ensuring plant safety in the event of a shut-down. The amount of these guarantees is currently €233,000. This sum could be used, among other things, to cover residual environmental risk prior to site rehabilitation.

## RAW MATERIALS

The papers produced by the Group are primarily composed of cellulose fibres. The virgin pulp used is produced from timber originating from sustainably managed forests. This policy is principally aimed at protecting biodiversity, ensuring the health and vitality of forests and preserving their socio-economic function.

Recycled fibres are also used to produce certain papers, which **Everbal** has made a speciality.

The Group has obtained FSC® and PEFC certification for its chain of custody in order to guarantee the traceability of fibre sources.

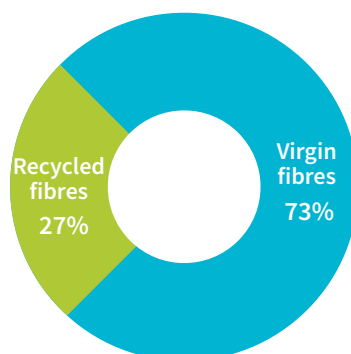


**Objective  
2025**

***PAPER MILLS: Purchase 100% certified virgin fibre pulp.  
→ Situation at 31/12/2022: 94.8%***

In 2022, the consumption of virgin and recycled pulp fibre from production sites amounted to 227,074 tonnes (185,374 tonnes in 2021). These paper mills filter their process water in order to recycle as much of these fibres as possible.

**Types of fibres used in  
paper production**



Paper production also requires the use of starches, mineral fillers and various additives, which provide the colouring and commercial properties (e.g. printing, writing) that are expected of our manufactured products.

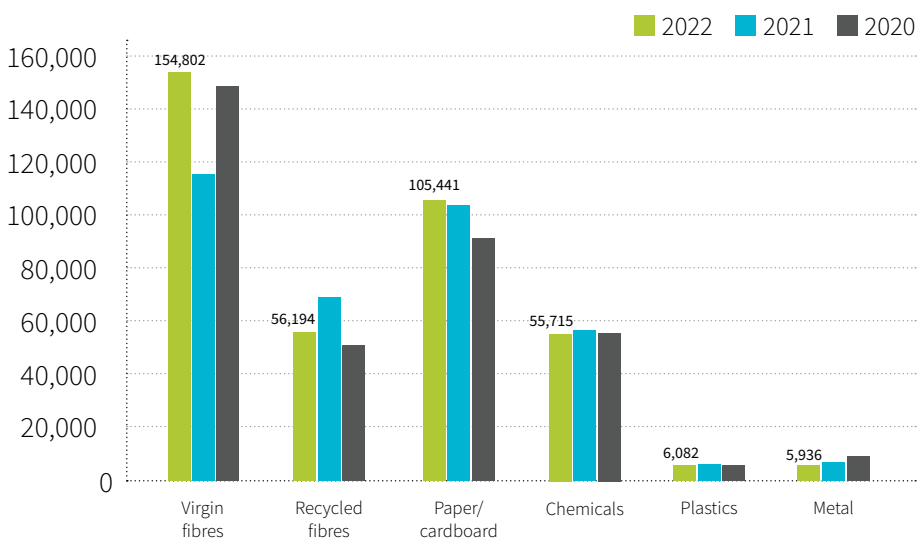
Retention agents are also used to improve the binding of additives to the fibres and thus reduce additive consumption.

A proportion of these papers are then used by the Group's processing factories, where they are combined with other materials - card, greyboard, metal parts (eyelets, binder mechanisms, etc.), glues and inks - to make thousands of different types of exercise books, notepads, notebooks, diaries and filing items.

The Group also uses plastics, to which great attention is paid. By way of example, in 2022, **Ernst Stadelmann** consumed 1,522 tonnes of polystyrene (PS) and polypropylene (PP) granules for manufacturing office equipment (drawer units, letter trays, etc.). Recycled granules accounted for 57% of supplies, thereby reducing the company's environmental footprint.

Besides the important role it plays in ensuring customer satisfaction, quality control also provides a number of environmental benefits. Checking products at all stages of the production process allows us to identify quality issues at an early stage, avoid excessive consumption of raw materials and limit the amount of waste.

**Main raw materials\* (excluding packaging)**  
**used by the production sites**  
**(tonnes)**



\* Not all raw materials have been included due to differences in the unit of measurement (per unit, per m, per m<sup>2</sup>). Purchased finished items, generally multi-material, are not taken into account.

# “WASTE” MANAGEMENT

The development of the concept of circular economy should ultimately lead to the replacement of the notion of “waste” by that of “secondary raw materials”, i.e. recovered materials that can be used as a partial substitute for virgin raw materials. In this sense, the paper industry is one of the drivers of the circular economy.

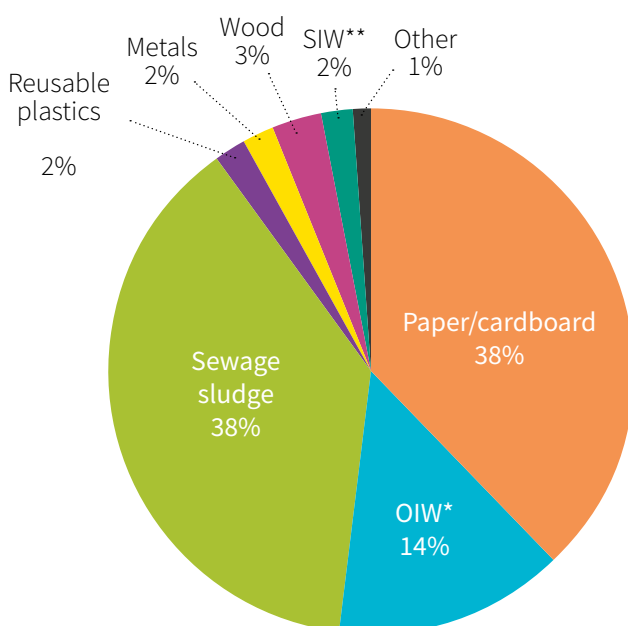
This principle is also applied by the Group. A large portion of the paper scrap collected by the processing plants is used by the **Everbal** plant, which specialises in producing recycled paper.

By sorting other types of waste (plastic, metal, etc.), the Group promotes the recycling of these materials by specialised firms.

Sludge emanating from the paper mill water treatment plants is used for farming purposes whether or not it is subject to composting or methanisation operations. When collected waste cannot be recycled, it is sent to an energy recovery facility. As a last resort, waste products that cannot be reused are sent to specialised treatment centres for disposal. Our staff are regularly made aware of the importance of sorting waste in order to optimise our performance.

In 2022, a total of 35,082 tonnes of waste was generated by the Group’s activities, most of which was recovered.

**Waste - Breakdown per category**



\* OIW: Ordinary industrial waste (non-recyclable)

\*\* SIW: Special industrial waste (e.g. chemical residues)



## COMBATING FOOD WASTE

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Few Group companies have a collective catering service. Employees who eat lunch on site are personally responsible for their food. A number of companies occasionally hire catering services offering daily delivery of meals prepared in individual portions. In both cases, the risk of food waste is extremely low.

## ENERGY CONSUMPTION

The paper production process is relatively energy-intensive:

- fuel used to produce the steam required to dry paper,
- electricity used in fibre refining, the pumping of liquids and the operation of machinery.



*Energy price fluctuations may have a significant impact on the cost price.*

Paper mills have therefore long been taking steps to limit energy consumption (insulation of dryer hoods, using heat recovery for heating process water and premises, installing variable speed drives on engines, etc.).

The processing sites are also working on these issues by purchasing more energy-efficient equipment or by seeking ways to optimise the lighting and heating of premises.

The energy management systems implemented by **Papeteries de Clairefontaine**, **Everbal** and **Falken** are ISO 50001 certified.

## FUELS

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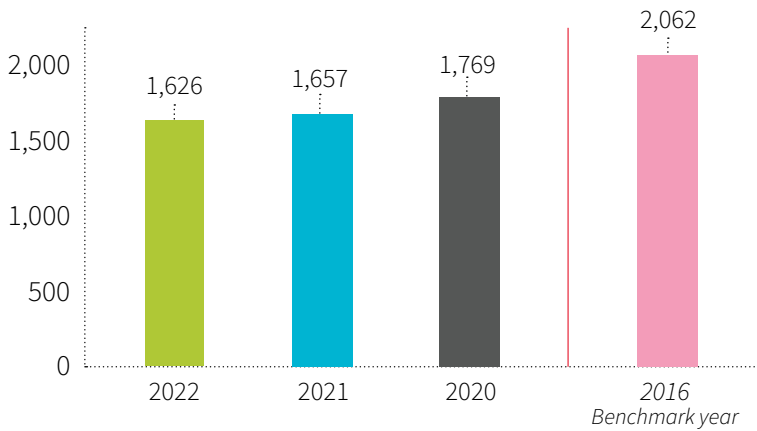
In 2022, the paper mills alone accounted for about 95% of total Group fuel consumption.

Natural gas is the primary fuel consumed by our facilities. It is the fossil fuel that emits the least amount of pollutants during combustion.

With its two biomass boilers, **Everbal** only uses heavy fuel oil when the main boilers are undergoing maintenance.

For its part, the **Papeteries de Clairefontaine** thermal power plant operates on the basis of co-generation, enabling the simultaneous generation of steam and electricity. For this purpose, the plant is fitted with one gas turbine and two steam turbines.

**Average consumption at the paper mills**  
(NCV kWh/tonne of gross paper production)



**Objective  
2025**

*PAPER MILLS: Reduce the fuel consumption of fixed facilities by 20% compared to 2016.*

**→ Situation at 31/12/2022: - 21.1%**

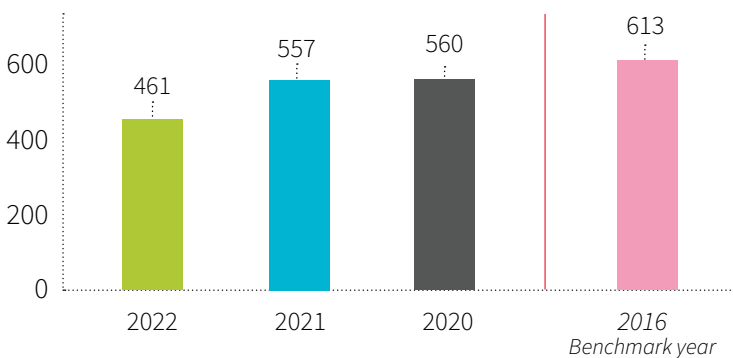
## ELECTRICITY

Four Group sites produce electricity (**Exaclair Limited, Schut Papier, Ernst Stadelmann and Papeteries de Clairefontaine**).

As such, most of the electricity consumed comes from the national power grid.

In 2022, the paper mills absorbed about 80% of all the electricity consumed by the Group.

**Average consumption at the paper mills**  
(kWh/tonne of gross paper production)



**Objective  
2025**

*PAPER MILLS: Reduce electricity consumption by 20% compared to 2016.*

**→ Situation at 31/12/2022: - 24.9%**

## USE OF RENEWABLE ENERGY

The Group uses renewable energy whenever possible in order to reduce the environmental impact of its activities, particularly with regard to global warming.

For this it uses:

- 2 biomass boilers (**Everbal**),
- the heat produced by an external biomass boiler (**Ernst Stadelmann**),
- geothermics (**Photoweb**),
- 1 hydroelectric turbine (**Papeteries de Clairefontaine**),
- solar panels (**Exaclair Limited**, **Schut** and Ernst Stadelmann).

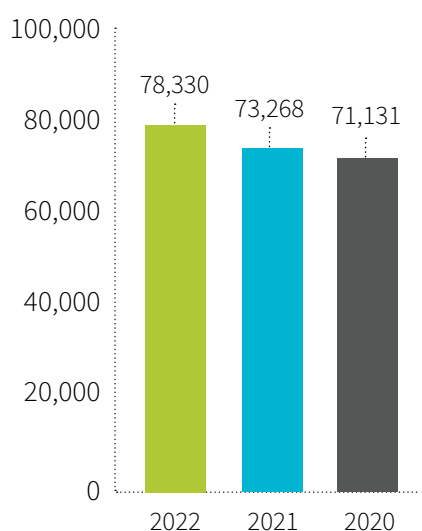
## ATMOSPHERIC EMISSIONS

### GREENHOUSE GASES

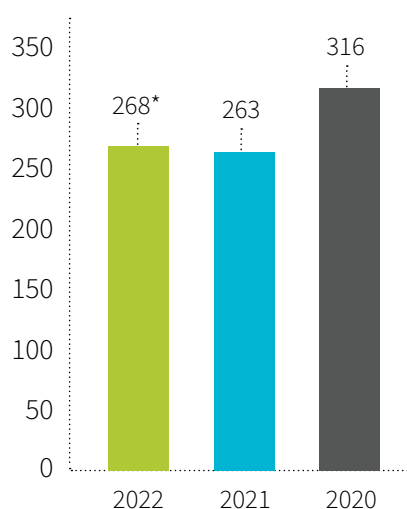
#### CARBON DIOXIDE (CO<sub>2</sub>)

Only the Group's three paper mills in France are subject to the European Union Emissions Trading System (EU ETS).

**Total CO<sub>2</sub> emissions declared as part of the EU ETS framework**  
(tonnes of CO<sub>2</sub>)



**Average emissions**  
(kg of CO<sub>2</sub>/tonne of gross paper production)



\*Average emissions increased in 2022, as the gas turbine at Papeteries de Clairefontaine operated for seven months compared to five in previous years.



The free allowances of CO<sub>2</sub> received by the Group were reduced from 74,155 tonnes in 2013 to 56,767 tonnes in 2022. The actual missing emissions allowances are purchased on the European exchange market. CO<sub>2</sub>, which traded at €4/tonne in December 2016, reached a record high in February 2023, exceeding the €100/tonne mark.

One of the Exacompta Clairefontaine Group’s objectives is to reduce its CO<sub>2</sub> emissions from fossil fuels by investing in renewable energy and taking action to limit energy consumption.

It should also be noted that **Papeteries de Clairefontaine** sends a portion of the smoke generated by its boilers to a precipitated calcium carbonate (PCC) production facility. The CO<sub>2</sub> necessary for manufacturing this mineral filler is captured directly in the smoke. **In 2022, as such 11,318 tonnes of CO<sub>2</sub> was consumed during the process and not emitted into the atmosphere.**

## MAIN CO<sub>2</sub> EMITTERS

Direct CO<sub>2</sub> emissions from fixed sources (in particular steam-generating combustion systems, heating of buildings and electricity production), mobile sources (handling equipment, company vehicles, trucks controlled by Group companies), as well as indirect emissions relating to mains electricity consumption, were taken into account. Due to lack of data, emissions generated by the transportation of raw materials and finished products and by employee travel could not be assessed.

In this respect, fixed combustion facilities are the main CO<sub>2</sub> emitters.

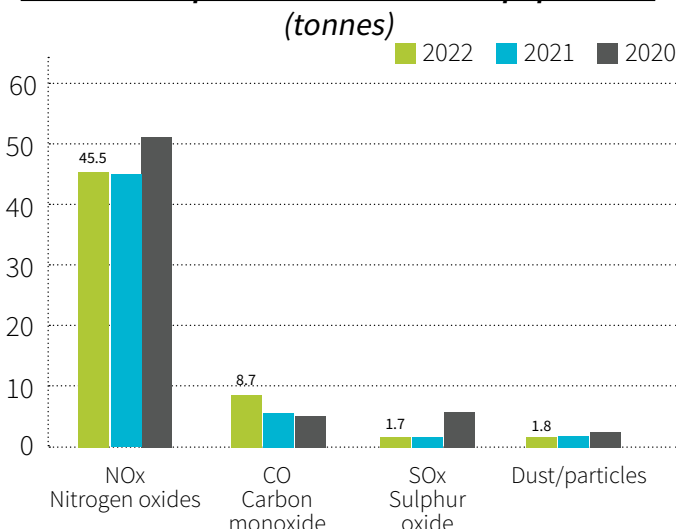
## OTHER GREENHOUSE GASES

Owing to refrigerant leaks in their air-conditioning systems, four sites were responsible for releasing 26 kg of fluorinated gases into the atmosphere in 2022 (61 kg in 2021). The other Group companies did not identify any such leaks or were unable to obtain precise data on the matter.

## OTHER ATMOSPHERIC EMISSIONS

Only the Group’s three paper mills in France are required to regularly measure emissions from their boilers.

### ***Other atmospheric emissions from paper mills***



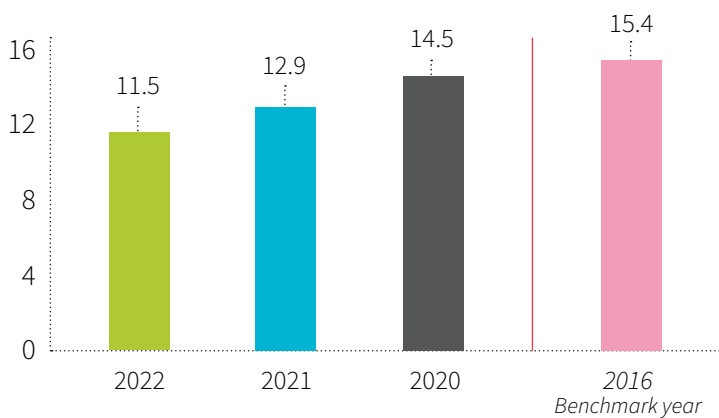
# WATER CONSUMPTION

Water is indispensable to the paper industry and it is essential that the supply of this resource is sustainable. Accordingly, the Exacompta Clairefontaine Group makes every effort to preserve the water supply and reduce its consumption.

The paper mills are the Group's biggest consumers of water. In 2022, they collectively accounted for over 90% of total surface water and groundwater consumption, including drinking water. However, the vast majority of extracted water is returned to the natural environment after treatment.

The Group's plants have never been subjected to water restrictions, except for paper mills during severe droughts, with no impact on their production level.

**Average water consumption at the Group's paper mills**  
(m<sup>3</sup>/tonne of gross paper production)



**Objective  
2025**

**PAPER MILLS:** Reduce water consumption by 20% compared to 2016.

**→ Situation at 31/12/2022: - 25.4%**



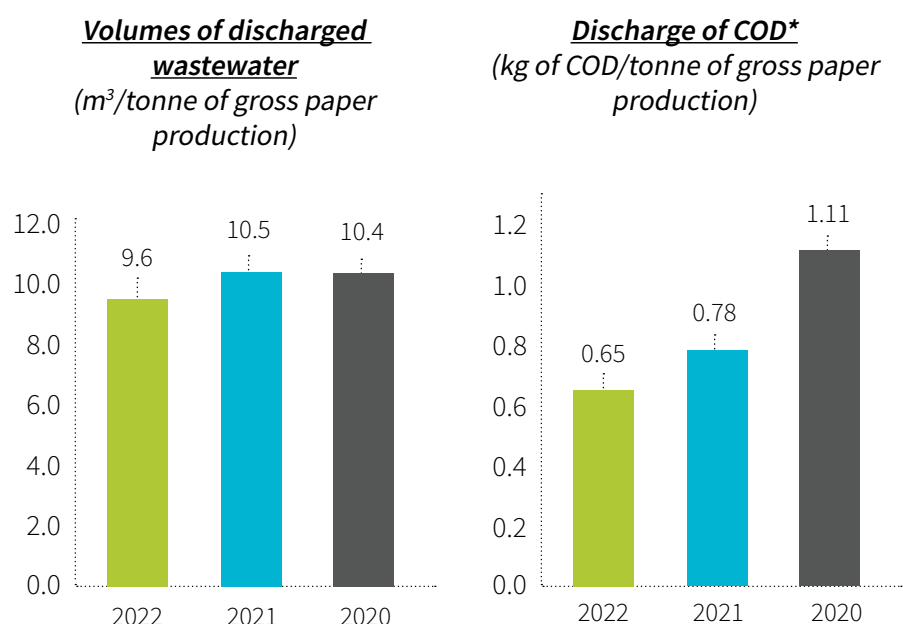
# DISCHARGE OF WASTEWATER

The Group's paper mills are equipped with wastewater treatment plants enabling them to limit the amount of pollutants discharged into the natural environment.

They are the only sites that measure wastewater quality on a very regular basis, either daily or continuously for certain parameters.

As the Group's other entities consume only a very small quantity of water, they are connected to municipal wastewater treatment plants or treat their effluent as special industrial waste.

## Paper mill emissions



\* COD: Chemical Oxygen Demand

# SOIL MANAGEMENT

## AGRICULTURAL RECYCLING OF SEWAGE SLUDGE

The sludge generated by the treatment of effluent produced during the paper production process is generally directly reused in farming or previously converted into standardised compost (French standard NF U44-095). **Papeterie de Mandeuire** and **Papeteries de Clairefontaine** also use methanisation.

Paper mill sludge contains elements that have agronomic value, which means that it can be used as a partial substitute for traditional chemical fertilisers.

The sludge is mostly recycled in agriculture as:

- organic soil amendment: rich in cellulose fibres, this type of sludge has a beneficial effect on soil structure;
- calcium soil amendment: one application provides on average a little over 2.5 tonnes of lime per hectare.

The concentration of metal trace elements (MTE) and trace organic compounds (TOC) in the sludge are well below the limits set by the regulation.

## SOIL MANAGEMENT AT GROUP SITES \_\_\_\_\_

The average rate of soil sealing at the Group's industrial sites is around 52%.

These sealed surfaces include the buildings, thoroughfares and car parks. Open spaces consist of green areas, lagoon-type areas and land reserves.

Regulations require that all potentially hazardous products or waste at these sites be stored on retention shelving so that any spills can be contained, thereby reducing the risk of soil pollution.

No soil pollution survey have been required on operational Group facilities since 2003.

## **NOISE AND OTHER TYPES OF POLLUTION**

Plant operations are conducted within closed buildings, thus limiting noise disturbance for local residents. Some sites are fitted with noise reduction systems (silencers and soundproof booths for high-noise machine sections).

Given that the paper mills have their own water treatment plants, unpleasant smells may very occasionally arise in the nearby areas.

Night lighting on Group sites is limited to facilities involving work in shifts (morning, afternoon, night). Unused areas are not lit. In these factories, exterior lighting is also maintained to reduce the risk of accidents, in thoroughfares and car parks in particular.

# ENVIRONMENTAL INCIDENTS

In 2022, four incidents were reported on industrial sites in France:

- **Papeteries de Clairefontaine** : collapse of a storage tank of calcium carbonate in solution with overflow into the Meurthe river;
- **Papeterie de Mandeuve**: two accidental discharges in the Doubs;
- **Quo Vadis**: fire in a waste compactor.

However, environmental impacts have been contained and the necessary corrective actions taken.

## BIODIVERSITY

The Exacompta Clairefontaine Group sponsors various initiatives in favour of biodiversity.

### OCEANOSCIENTIFIC

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From 2014 to 2021, **Papeteries de Clairefontaine** financially supported the Oceanoscientific association, which studies the causes and consequences of climate change at the ocean-atmosphere interface. Over this period, the company donated €394,000 to this association dedicated to ocean protection.



### CONSERVATOIRE D'ESPACES NATURELS DE LORRAINE

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**Papeteries de Clairefontaine**, the Lorraine *Conservatoire d'Espaces Naturels* (CEN - conservatory of natural spaces) and a farmer entered into a management agreement in 2005. This agreement relates to the preservation, on the land belonging to the company, of hay meadows inhabited by a butterfly (Dusky Large Blue) included on the French list of protected insect species.



Due to the presence of habitats and species of European Community interest, this nature reserve was made into a Natura 2000 site.



## OBSERVATOIRE DES CARNIVORES SAUVAGES



Since 2022, the Exacompta Clairefontaine Group provides financial support to the *Observatoire des Carnivores Sauvages* (wild carnivores observatory). The aim of this association is the study and conservation of wild carnivores in Eastern France. It monitors three species in particular: lynxes, wolves and wildcats.



## GRUPE D'ETUDE RAPACES VOSGES



Since 2022, financial support is also provided to the *Groupe d'Etude Rapaces Vosges* (Vosges raptor study group), which aims in particular to study, monitor and protect two iconic species: the peregrine falcon (on the cover of this report) and the Eurasian eagle owl, whose numbers in the Vosges department are relatively low.

## REPORTERS WITHOUT BORDERS



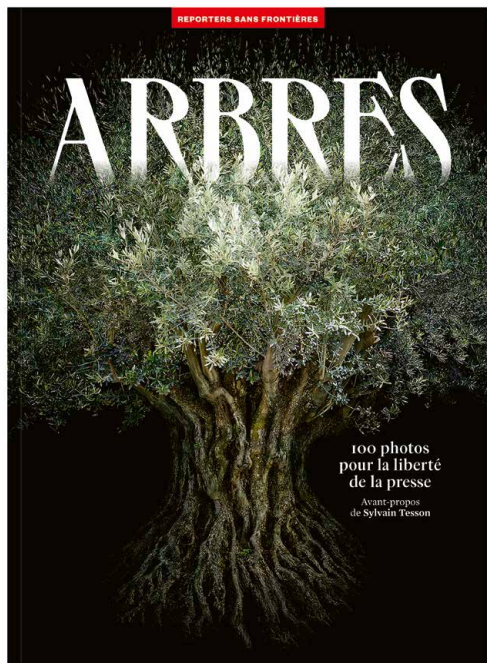
Owing to its activities, Exacompta Clairefontaine has a strong attachment to the forest and to trees in all their facets.

It follows therefore that the Group provided support to the tune of €50,000 for the 70<sup>th</sup> issue of the collection of albums dedicated to trees, entitled “100 photos pour la liberté de la presse” (100 photos for the freedom of the press) published in 2022.

With a preface written by Sylvain Tesson, this book offers magnificent images of trees captured by well-known photographers such as: Yann Arthus-Bertrand, Laurent Baheux, Alexandra Boulat, Henri Cartier-Bresson, Robert Capa, Robert Doisneau, Catalina Martin-Chico, Steve McCurry, Joel Meyerowitz, Vincent Munier, Sebastião Salgado and Sabine Weiss.

The album is divided into five chapters: Trees and forests, Trees and animals, Trees and human beings, Endangered trees and Tree and cities.

The photos are accompanied by texts written by biologists Gilles Boeuf, Gilles Clément, Francis Hallé, and Marc-André Selosse.



## THE EFFECTS OF CLIMATE CHANGE

For the time being, the consequences of climate change have not had a material impact on the activities of the Exacompta Clairefontaine Group.

However, the paper industry may be impacted by this phenomenon on multiple levels.



*Prolonged periods of drought have tended to be more frequent and more severe over recent years. Water usage restrictions may limit paper mill production capacity.*

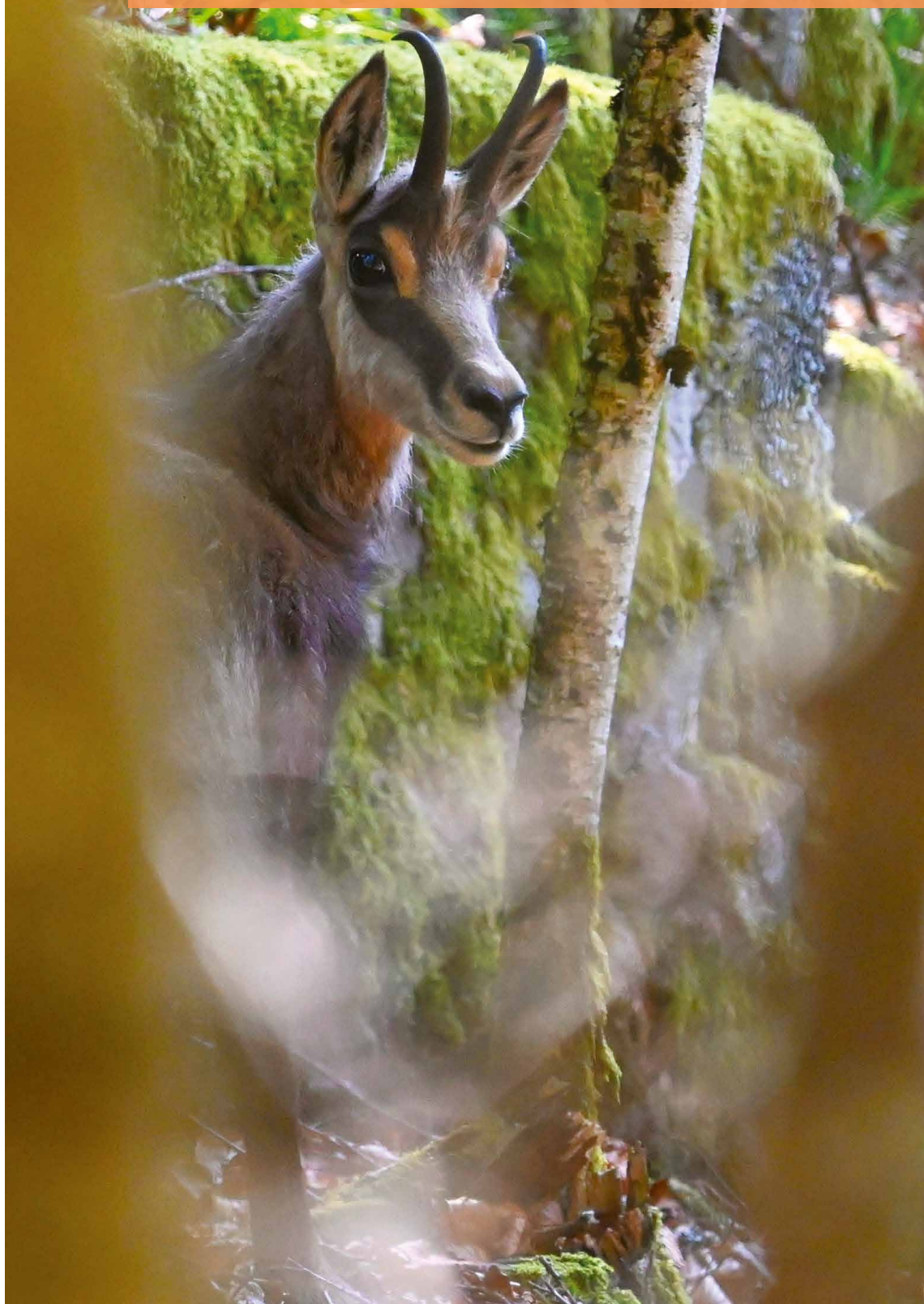


*During low-water periods, i.e. when a water stream is at its lowest level, the self-purification capacity of the natural environment is weaker. During this period, any malfunction at wastewater treatment works may result in a discharge having a harmful impact on aquatic fauna and flora.*



*A number of the raw materials used by paper mills are sourced from the agricultural sector, such as starches from wheat, corn and potatoes. Climate disturbances may impact the availability of these resources, a significant proportion of which is used in human and animal foods.*

# EMPLOYEE INFORMATION



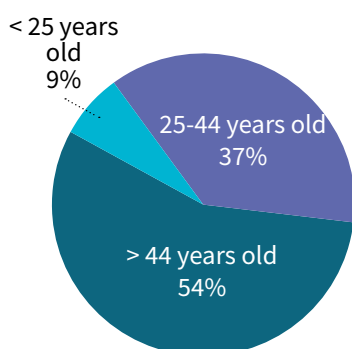
# THE GROUP'S HUMAN CAPITAL

At the end of 2022, Exacompta Clairefontaine employed almost 3,500 people, 71% of whom were based in France.

Based on the available data, 40% of employees are female and 60% are male. The vast majority of employees (94%) held permanent employment contracts.

With regard to staff turnover, most departures were related to contract expiration (56%), reflecting the seasonal nature of part of the Group's activities. The use of fixed-term or temporary workers at certain times of the year allows the Group to cope with fluctuations in its manufacturing business, in preparation for the start of the school year, the manufacture of products linked to the annual cycle (diaries, calendars, etc.) or festival or holiday periods (photo books).

## Breakdown of workforce by age group



*54% of the employees included in the study were over 44 years old. However, numerous business activities require knowledge and expertise that must be handed down before older generations retire.*

## SKILLS DEVELOPMENT

In response to an ever-changing market and new technologies, the Group's companies must be flexible in order to adapt quickly to demand. This means supporting and anticipating the transformation of business activities and the way in which work is structured.

As such, the human resources teams and business line managers work closely together and are committed to ensuring that employees' skills match the companies' requirements on a continuous basis. Once these requirements have been identified, training programmes are prepared and carried out.

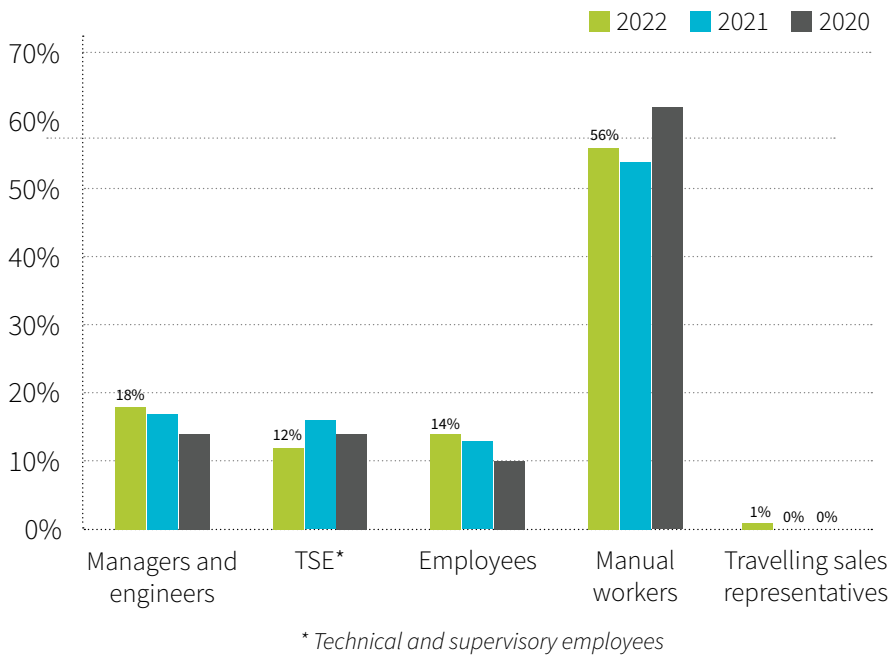
Within this fluid environment, the recognition and transfer of expertise are essential and proper planning for retirement is paramount.


In order to achieve this, the Group's companies encourage employees to formalise recognition of their specific or transferable skills through professional qualification certificates.

Some companies also operate a mentoring system in order to transfer the know-how of experienced staff members before they retire and promote staff versatility.

In 2022, the companies included in the study delivered a total of 26,032 hours of training (27,087 hours in 2021), either in-house or through certified training organisations, at a total cost of €1,575,000 (€1,702,000 in 2021).

**Breakdown of total hours of training received by professional category**





**Objective 2025**

*PAPER MILLS: Achieve an employment rate of managers and technical and supervisory employees of at least 35%*

**→ Situation at 31/12/2022: 28.9%**

## EQUAL OPPORTUNITIES AND DIVERSITY

Equal opportunities, non-discrimination and diversity are fundamental values which the Exacompta Clairefontaine Group is committed to upholding.

Gender and ethnicity play no part in recruitment and career development, as the Group gives priority to skills and professional merit.

Occupational training is a major lever for eliminating inequalities in the career paths of men and women.

The Group also employs people with disabilities (at least 131 at the end of 2022), adapting workstations as necessary.

# EMPLOYEE HEALTH AND SAFETY

## PREVENTIVE MEASURES

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Another of the Group's concerns is ensuring optimum working conditions in order to guarantee employee health and safety.

With this in mind, all production and logistics sites have a safety officer.

Action plans based on occupational risk analysis are implemented in order to eliminate risks or mitigate those that cannot be completely avoided.

In 2022, over €941,000 was invested to improve employee safety (€692,000 in 2021).

An overview of the measures taken is presented below:

- reduction of repetitive tasks and ergonomic improvement
  - **AFA, Clairefontaine stationery**: purchase of ergonomic chairs, footrests and computer mice, magnifying lamps and briefcases;
  - **Manuclass**: acquisition of an automatic taping machine, changes to machines to reduce jams, adjustment of the inclination of feeders to reduce stress on shoulders and wrists;
  - **Quo Vadis, Manuclass, Papeteries de Clairefontaine**: purchase of electric high-lift pallet trucks;
  - **Madly**: installation of an automatic waxing machine (application of wax on caps) and a lift table;
  - **Quo Vadis**: change to the product reception area on a machine, installation of an access platform;
  - **Papeteries de Clairefontaine**: at the reel packing station, installation of an automatic cardboard disc laying robot to protect reel sides, purchase of lift tables;
- support for handling tasks and reduction in load carrying
  - **Papeteries de Clairefontaine, Quo Vadis**: upgrading of handling equipment;
  - **Papeteries de Clairefontaine**: provision of a drum turner, installation of a starch bag handling aid;
- work equipment safety and improvements
  - **CFR**: installation of safety barriers;
  - **Everbal**: purchase of inflatable spindles for winding machines, repair of the handling device in the press section of the paper machine, repair of the gas detection unit of the hydrosulfite room, replacement of the safety net above the forming fabric;

- **Papeteries de Clairefontaine:** installation of an automatic reel conveying line from the packaging station to the storage warehouse, acquisition of a separate platform and rolling scaffolding to secure height-access systems.



Papeteries de Clairefontaine - robot for the automatic laying of cardboard discs

## INDUSTRIAL ACCIDENTS AND OCCUPATIONAL ILLNESSES

In the companies reviewed, 3,820 days were lost due to industrial accidents (including commuting accidents) in 2022, compared to 2,510 in 2021.

	2022	2021	2020
<b>Frequency rate</b> Number of lost time industrial accidents per 1,000,000 hours worked	24.6	20.9	23.0
<b>Severity rate</b> Number of working days lost per 1,000 hours worked	0.8	0.5	0.8

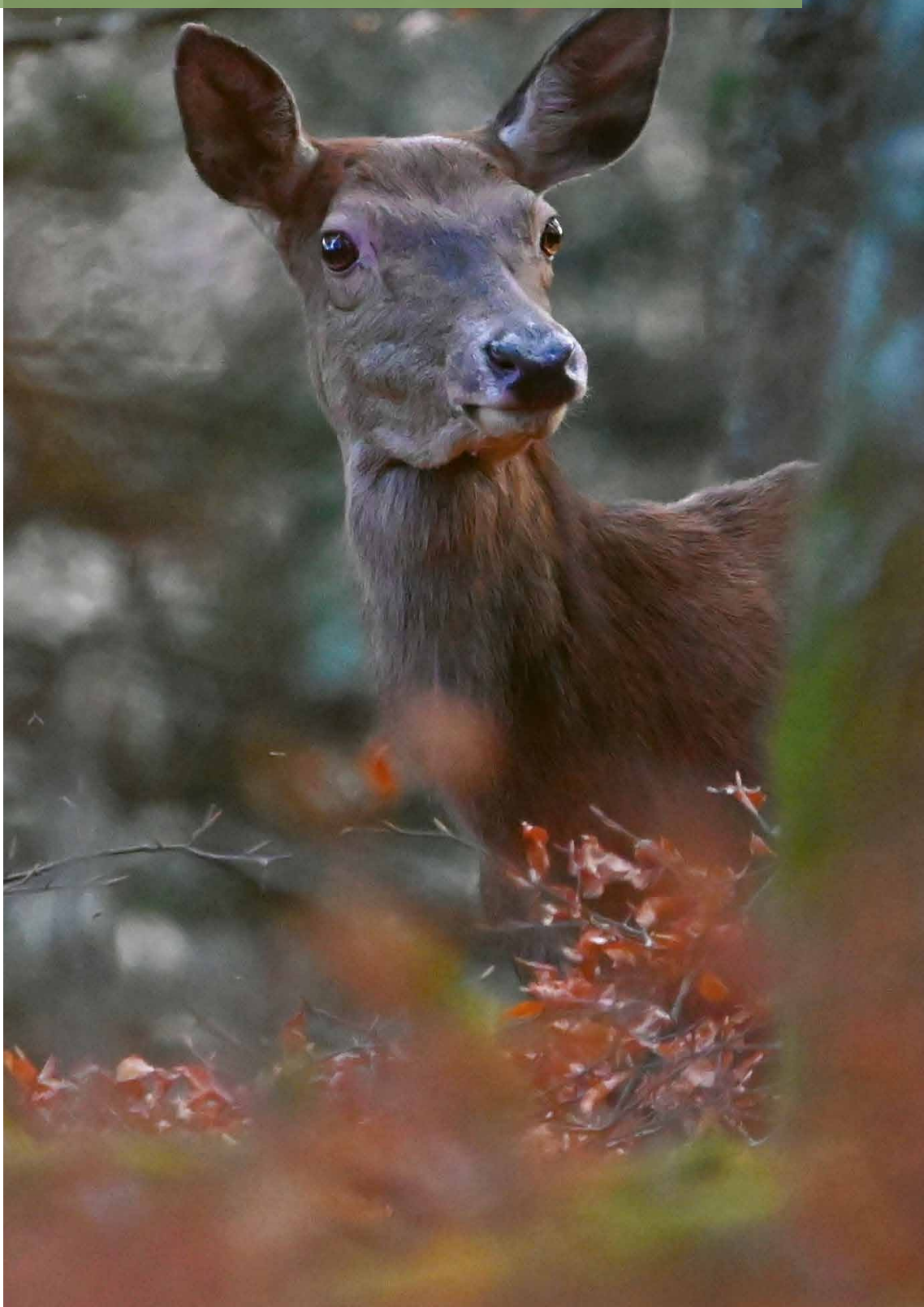
With regard to reported illnesses, nine were deemed occupational illnesses at the Group's French sites (nine in 2021 too). The Exacompta Clairefontaine Group continuously enhances its health and safety policy in order to work towards achieving the lowest possible accident rate.



Objective  
2025

*GROUP: Achieve a frequency rate lower than 15.*  
→ **Situation at 31/12/2022: 24.6**

# REGIONAL INVOLVEMENT





# IMPACT ON THE LOCAL ECONOMY

All Exacompta Clairefontaine subsidiaries play a vital role in their local economies, both as employers and in terms of their commitment and contribution to local communities. Recruitment is typically drawn from people living in the vicinity of factories and other operational centres, but a wider scope is also applied for specific skills.

For example, **Papeteries de Clairefontaine** has been present in the village of Étival-Clairefontaine (Vosges) since 1858 and employs around 550 people. Over time, close bonds have been formed with the surrounding cities and villages.

Over the past thirty years, the Group's growth has in part been due to acquisitions of other companies. They are most often kept in the same location with a focus on specialising in their core profession. As such, in 2022 in France, 88% of employees worked at sites located outside the greater Paris region.

Since its inception, the Group's majority shareholders have been members of the same family. A number of families of current employees have had members working for the Group over six or seven generations. The tradition of going to work in the same factory as one's parents is still alive today.

## TAX POLICY

The Group has little exposure to tax evasion risk due to its structure. None of the Group entities are located in a 'tax haven'.

All French companies except Fizzer are consolidated for tax purposes with intercompany transactions eliminated for such purposes.

Risks related to proceedings, tax audits and litigation are presented in the Group management report.

Tax returns, the payment of taxes and duties and accounting records are prepared and submitted in each country in which the subsidiaries are established.

Transactions involving foreign subsidiaries are carried out in accordance with the OECD principles on transfer pricing.

## FAIR PRACTICES

The prevention of active and passive corruption and money laundering is a key concern of senior management. A code of conduct was circulated to all Group employees in 2017. This code specifically meets the requirements of the 8 November 2016 French Sapin II law for the prevention and detection of corruption and influence peddling and is available on the Group's website.

# PROCUREMENT AND SUBCONTRACTING

Exacompta Clairefontaine is a French group with a European mindset. Social and environmental issues are taken into account through the certifications required by our customers or as part of the Group's QSE policy.

Fibrous raw material suppliers (pulp and paper) generally have FSC®, PEFC or Blue Angel certification.

Printing suppliers are generally Imprim'Vert® certified. For a supplier or product to be selected, it must be deemed environmentally friendly. Supporting documentation may be requested and checked, particularly in the case of products carrying European Ecolabel certification.

The Group seldom subcontracts and, when it does, subcontractors are mainly locally based. The operations concerned may also be performed in-house.

# PRODUCT SAFETY

The health and safety of our consumers is paramount. Some product lines must comply with standards and regulations regarding toy safety or hygienic requirements for materials and packaging in contact with food.

For example, all products in the **Avenue Mandarine** range bear CE marking for toys.

# PARTNERSHIPS

The Group is strongly committed to encouraging young people to practice sport. All kinds of sport contribute towards a child's growth and development by instilling values of respect, drive, performance, ambition and equality.



*Olympique Lyonnais*

Exacompta Clairefontaine sponsors a number of French youth teams practising various sports, including football, basketball, rugby, handball (PSG), hockey and cycling.

In addition to supporting amateur and leisure sports, **Clairefontaine Rhodia** is also the main sponsor of boys' and girls' youth teams (aged 7-19) for a number of highly respected French football clubs. The Group sponsors Olympique Lyonnais, FC Nantes, OGC Nice, SM Caen, Sochaux-Montbéliard Football Club, and AJ Auxerre.

The Group also supports cultural activities, including festivals and a range of other projects through sponsorship. Group companies are committed to the local communities of their employees.

## HUMAN RIGHTS AND EDUCATIONAL INITIATIVES

The Exacompta Clairefontaine Group is particularly attentive to compliance with human rights and fundamental principles and rights at work.

Education is the central pillar on which Group initiatives in support of these principles are based. Exacompta Clairefontaine is committed to helping children to successfully complete their education and has set up a number of projects to promote education and raise public awareness of children's rights.

### SUPPORT TO UNICEF

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From 2004 to 2021, Clairefontaine Rhodia has contributed nearly €4,610,000 to UNICEF to support the "Education in Togo" programme and more generally to enable it to pursue its mission to improve the rights of the most vulnerable children around the world.

### SUPPORT TO HUMANITY & INCLUSION (HANDICAP INTERNATIONAL)

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From 2022 onwards, Clairefontaine Rhodia has decided to support Humanity & Inclusion, having already donated €150,000 for the 2021-2022 period.

This NGO is an independent international charity working for the last 40 years in situations of poverty and exclusion, conflict and disaster. Working alongside disabled and vulnerable people, the charity takes action and testifies so as to meet people's basic needs and improve their living conditions.

This action is in keeping with Clairefontaine's long-standing desire to pay special attention to people with disabilities. Ten years ago, Clairefontaine innovated by creating its first range of stationery adapted to the specific needs of people with visual impairments. By partnering with Humanity & Inclusion, an expert in the field of inclusion, Clairefontaine, a player committed to learning and knowledge, aims to go further and meet new needs.

## COMBATING BULLYING AT SCHOOL \_\_\_\_\_

Bullying is defined as repeated violence that can be verbal, physical or psychological. Such violence can also be present in schools: it is an act by one or more students against a victim who cannot defend themselves. When a child or teenager is insulted, threatened, beaten, pushed or repeatedly receives abusive messages, it is called bullying.

Since 2019, Clairefontaine has been committed to raising awareness among young people about this scourge.

For the 2022 school year, Clairefontaine reinforced its commitment by launching a major free speech movement on social media: **#HASHTAGROUGE**.

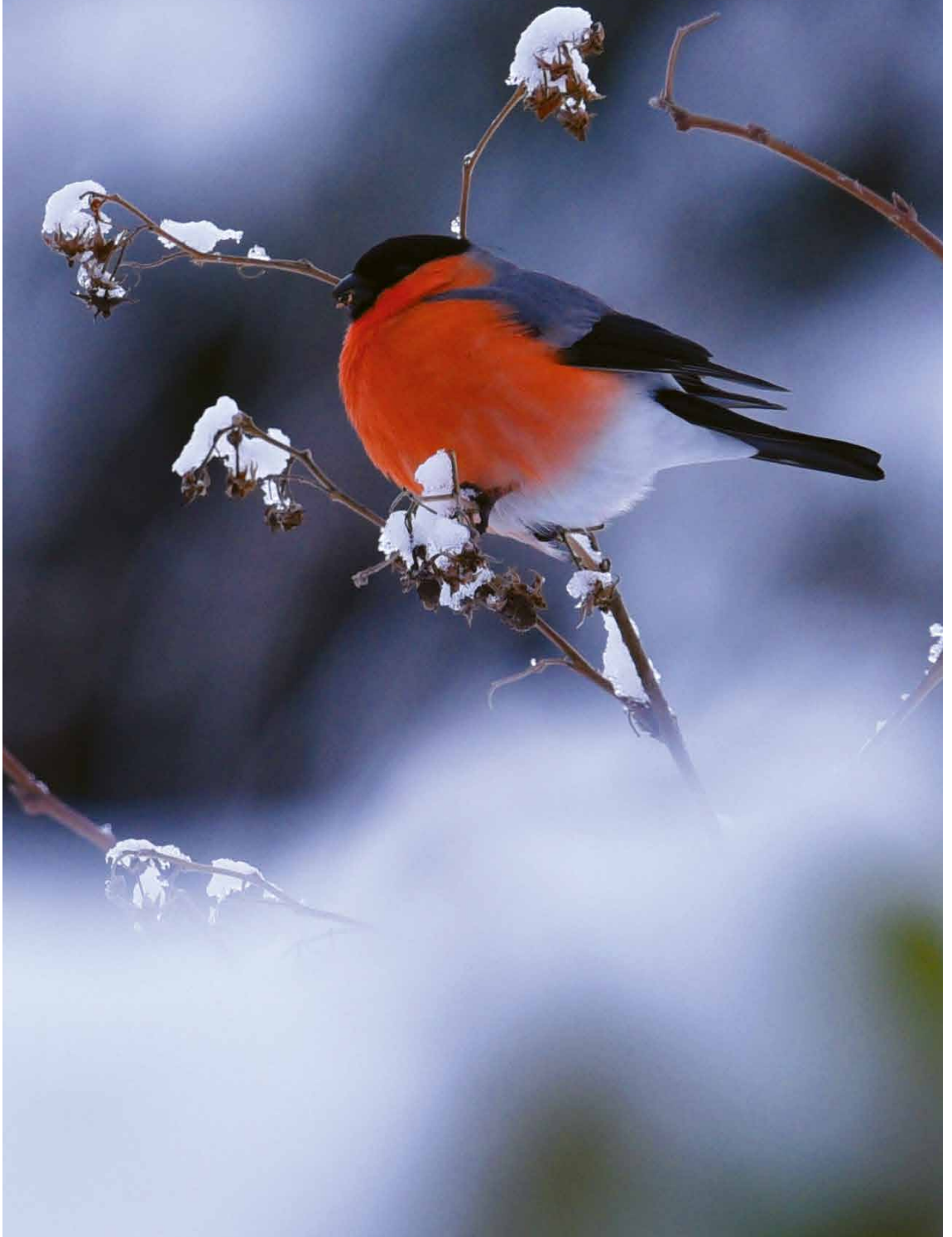
To fight against school bullying, the first thing to do is to talk about it. This is why Clairefontaine wanted to give the opportunity to influencers, victims, witnesses, teachers or former bullies to express themselves on this subject and invite young people to do the same through **#HASHTAGROUGE**.



Consequently, @SundyJules, @SullivanGwed, @theodortytb, @MsiieurleProf, @Sparkdise, @WesleyKrid and others have taken to social media to share their experience and tips on how to tackle it.

Some testimonies were relayed through Konbini (online media) to ensure an even stronger visibility of the movement among a very broad target group (young people, parents, teachers, etc.).

# SUMMARY OF THE MAIN ISSUES



Issue	Policy	Indicator	2025 targets	Outcome at end-2022
Sustainable forest management	Purchase of FSC- and PEFC-certified virgin pulp	<b>Purchase rate of certified fibres</b>	100%	94.8%
Control of energy consumption	Research into sources of energy savings and implementation of action plans	<b>Fuel consumption</b> (NCV kWh/tonne of gross paper production)	20% reduction versus 2016	- 21.1%
		<b>Electricity consumption</b> (kWh/tonne of gross paper production)	20% reduction versus 2016	- 24.9%
Preservation of water resources	Research into sources of water savings and implementation of action plans	<b>Water consumption</b> (m <sup>3</sup> /tonne of gross paper production)	20% reduction versus 2016	- 25.4%
Employee health and safety	Application of the occupational risk assessment document, implementation of action plans	<b>Industrial accident frequency rate</b> Number of lost time industrial accidents per 1,000,000 hours worked	<15	24.6
Employee skills development and management	Identification of existing skills to be maintained and new skills to be developed, implementation of action plans	<b>Employment rate of managers and technical and supervisory employees</b>	≥ 35%	28.9%

*Coverage rate*

- environmental indicators: 100%

- social indicators: 94.6%

# VERIFICATION REPORT

## ON THE STATEMENT OF NON-FINANCIAL PERFORMANCE

The statement of non-financial performance under review relates to the fiscal year ended 31 December 2022.

To the Shareholders' Meeting,

In our capacity as an independent third-party body accredited by COFRAC under the number 3-1877 (scope of accreditation available at [www.cofrac.fr](http://www.cofrac.fr)), we have conducted our work aiming to deliver a reasoned opinion expressing a conclusion of moderate assurance on the historical information (actual or extrapolated) contained in the statement of non-financial performance, prepared in accordance with the entity's procedures (hereinafter the "Procedures") relating to the fiscal year ended 31/12/2022 (hereinafter "Information" and the "Statement"), as presented in the management report in accordance with the statutory and regulatory requirements of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code.

### CONCLUSION

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On the basis of the procedures performed, as described in the "Nature and scope of the assignment" section, and of the elements we have gathered, we found no material irregularity that would call into question the compliance of the statement of non-financial performance with the applicable regulatory provisions and the fact that the Information, taken as a whole, is presented accurately in accordance with the Procedures.

### OBSERVATIONS

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Without calling into question the conclusion expressed above and in accordance with the provisions of Article A. 225-3 of the French Commercial Code, we make the following comments:

- We draw your attention to the need to ensure that data collection is properly anticipated by all sites included within the scope of this statement of non-financial performance in order to meet the deadline set. In addition, it is important to ensure that at each site a data collection manager is identified (person with a good knowledge of the subjects on which data is reported in connection with their site) and who can be contacted for any discussions (remotely or directly on site) suggested during the non-financial audit;
- We also encourage you to create a business model in diagram format, with a clear and educational visual presentation, which would provide the reader with a proper understanding of the Exacompta Clairefontaine Group's activities;
- In addition, please ensure you understand the strategic nature of each quantified data identified as a key performance indicator. And finally, along the same lines, we note that there is no key performance indicator concerning the societal pillar.

## PREPARATION OF THE STATEMENT OF NON-FINANCIAL PERFORMANCE \_\_\_\_\_

The absence of a generally accepted and commonly used framework or established practices to assess and measure information allows for the use of different, but acceptable, measurement techniques that may affect comparability across entities and over time.

Therefore, the information must be read and understood by reference to the Procedures, the significant aspects of which are presented in the Statement.

## LIMITATIONS INHERENT IN THE PREPARATION OF THE INFORMATION \_\_\_\_\_

The Information may be subject to uncertainty inherent in the state of scientific or economic knowledge and the quality of external data used. Some information is sensitive to the methodological choices, assumptions and/or estimates used in its preparation and presented in the Statement.

## RESPONSIBILITY OF THE ENTITY \_\_\_\_\_

It is the responsibility of the Board of Directors:

- to select or establish appropriate criteria for preparing the Information;
- to prepare a Statement in accordance with statutory and regulatory provisions, including the presentation of the business model, a description of the principal non-financial risks, a presentation of the policies applied with regard to those risks and the effects of these policies, including key performance indicators and the information set out in Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- and to put in place the internal control which it deems necessary for preparing the Information free of material misstatements, whether due to fraud or errors.

The Statement was established by applying the entity's Procedures as mentioned above.

## RESPONSIBILITY OF THE INDEPENDENT THIRD PARTY BODY \_\_\_\_\_

It is our responsibility, on the basis of our work, to formulate a reasoned opinion expressing a conclusion of moderate assurance on:

- the compliance of the Statement with the provisions of Article R. 225-105 of the French Commercial Code;
- the accuracy of the historical information (actual or extrapolated) provided pursuant to Article R. 225-105 I (3) and II of the French Commercial Code, namely the outcome of the policies, including key performance indicators, and measures relating to the main risks.



Since it is our responsibility to express an independent conclusion on the Information as prepared by management, we are not allowed to be involved in the preparation of said Information as this could compromise our independence.

We are not responsible for issuing an opinion on:

- the entity's compliance with other applicable statutory and regulatory provisions (including the disclosures required under Article 8 of Regulation (EU) 2020/852 (green taxonomy), the vigilance, anti-corruption and tax evasion plan);
- the truthfulness of the information provided for in Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- the compliance of products and services with applicable regulations.

## REGULATORY PROVISIONS AND APPLICABLE PROFESSIONAL POLICIES \_\_\_\_\_

Our work described below was carried out in accordance with the provisions of Articles A. 225-1 et seq. of the French Commercial Code and the professional policies of the *Compagnie Nationale des Commissaires aux Comptes* (French National Institute of Statutory Auditors) concerning this assignment serving as a verification programme.

## INDEPENDENCE AND QUALITY CONTROL \_\_\_\_\_

Our independence is defined by the provisions of Article L. 822.11 of the French Commercial Code and the French Code of Ethics for statutory auditors. Furthermore, we have implemented a quality control system comprising documented policies and procedures designed to ensure compliance with applicable laws and regulations, rules of conduct and professional policies of the *Compagnie Nationale des Commissaires aux Comptes* (French National Institute of Statutory Auditors).

## MEANS AND RESOURCES \_\_\_\_\_

Our work was carried out by three people in April 2023 over a total procedure time of three weeks.

We consulted our experts in sustainable development and corporate social responsibility to assist us in the conduct of our work.

We conducted six interviews with the people responsible for the preparation of the Statement [representing in particular the Quality/Safety/Environment, Senior management and Human Resources departments].

## NATURE AND SCOPE OF THE ASSIGNMENT \_\_\_\_\_

We planned and performed our work taking into account the risk of material misstatements in the Information.

We believe that the procedures we have conducted in exercising our professional judgement allow us to express a conclusion of moderate assurance:

- we reviewed all the entities included in the scope of consolidation and the report on the principal social risks;
- we assessed the appropriateness of the Procedures in terms of their relevance, completeness, reliability, neutrality and understandability, taking industry best practices into consideration as applicable;
- we verified that the Statement covers each category of information referred to in Article L. 225-102-1 III of the French Commercial Code in relation to social and environmental matters;
- we verified that the Statement presents the information referred to in Article R. 225-105 II where relevant with regard to the principal risks and includes, where applicable, an explanation of the reasons justifying the absence of the information required by Article L. 225-102-1 III (2);
- we verified that the Statement presents the business model and description of the principal risks related to the activity of all the entities included in the scope of consolidation, including, where relevant and proportionate, the risks generated by its business relations, its products or its services, as well as the policies, actions and outcome including key performance indicators related to the principal risks;
- we consulted the documentary sources and conducted interviews in order to:
  - assess the selection and validation process for the principal risks as well as the consistency of the results, including the key performance indicators used with regard to the principal risks and policies presented, and
  - corroborate the qualitative information (actions and outcome) that we considered to be the most significant, presented in *Note 1*. For risks related to climate change and the quality of products/ services and customer relations, our work was carried out at the level of the consolidating entity; for other risks, work was carried out at the level of the consolidating entity and in a selected number of entities as specified in *Note 1*;
- We verified that the Statement covers the scope of consolidation, namely all the entities included in the scope of consolidation in accordance with Article L. 233-16 of the French Commercial Code;
- We reviewed the internal control and risk management procedures implemented by the entity and assessed the collection procedures that are intended to ensure the completeness and consistency of the Information;
- For the key performance indicators and other quantitative results that we considered to be the most significant presented in *Appendix 1*, we implemented:
  - analytical procedures involving verification of the proper consolidation of the data collected as well as the consistency of changes in said data;

- detailed tests based on samples or other means of selection in which we verified the correct application of the definitions and procedures and compared the data provided with the supporting documentation. This verification work was carried out on a selection of contributing entities and covers between 9.3% and 21.06% of the consolidated data selected for these tests;
- we assessed the overall consistency the Statement with regard to our knowledge of all the entities included in the scope of consolidation.

The procedures implemented in the context of a moderate assurance engagement are less extensive than those required for a reasonable assurance engagement carried out in accordance with the professional policies of the *Compagnie Nationale des Commissaires aux Comptes* (French National Institute of Statutory Auditors); a higher level assurance would have required more extensive audit work.

Niort, 27 April 2023

THE INDEPENDENT THIRD-PARTY BODY  
GROUPE Y Audit

Arnaud Moyon  
Partner, Sustainable Development Department

*Note 1: Contributing entities*

Issue	Selected indicators	Selection of contributing entities	Coverage rate of the tests (depending on headcount)	Average coverage rate
Employee skills development and management	Employment rate of managers, technical and supervisory employees	<b>Exacompta Falken Schut Paper</b>	17.11%	13.2%
Preservation of employee health and safety	Frequency rate of industrial accidents	<b>Exacompta Schut Paper</b>	9.29%	
Preservation of water resources	Number of m <sup>3</sup> of water consumed for 1 tonne of paper	<b>Papeteries de Clairefontaine Schut Paper</b>	17.37%	18.55%
Control of energy consumption	Consumption of fuels	<b>Papeteries de Clairefontaine Papeteries de Mandeuire</b>	19.73%	
	Consumption of electricity	<b>Papeteries de Clairefontaine Schut Paper Papeteries de Mandeuire</b>	21.06%	
Sustainable forest management	Share of recycled fibres in total paper production	<b>Papeteries de Clairefontaine</b>	16.04%	



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EXACOMPTA CLAIREFONTAINE

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