



NOVOLEX

2022

SUSTAINABILITY REPORT

CHOICE. INNOVATION. SUSTAINABILITY.

TABLE OF CONTENTS

03 CEO MESSAGE

04 NOVOLEX APPROACH TO SUSTAINABILITY

- 05 Sustainability Vision, Pillars and Metrics
- 06 Novolex Values
- 07 Governance

08 PRODUCTS

- 08 Product Carbon Footprint (PCF)
- 09 Raw Materials
- 13 Recyclable, Compostable or Reusable Products
- 16 Policy and Partnerships

17 OPERATIONS

- 17 Greenhouse Gas Reduction Target
- 19 Air, Waste and Water
- 21 Food and Product Safety

22 PEOPLE AND COMMUNITIES

- 23 Safety
- 25 Ethics, Integrity and Human Rights
- 26 Human Capital
- 29 Employee Health and Wellness
- 30 Communities and Focused Giving

31 APPENDIX

- 31 Materiality Assessment
- 32 GRI Index



OUR NOVOLEX FAMILY



CEO MESSAGE

The story of Novolex is one of continuous growth, change and family.

Our business and the industries in which we participate are evolving, and so too must the nature of our environmental, social and governance (ESG) initiatives. We have been on this journey for 15 years and I am pleased to report our progress developing more sustainable products, expanding recycling, providing safe and inclusive workplaces, and more.

In 2022, we continued to press ahead with our ambitious commitment to reduce greenhouse gas emissions from operations 30% by 2030. In addition, we invested \$10 million in our recycling facility that specializes in processing post-consumer recycled polyethylene films. Products made with post-consumer content use less virgin material and are just one of the ways we're providing more sustainable packaging solutions.

We continued our efforts to develop new products that have one or more sustainability attributes—either due to the materials that were used or ways in which the product can be disposed of after use. Notably, our innovation teams introduced a record number of compostable products which, in addition to supporting zero waste strategies and our customers' sustainability goals, can also fuel the growth of commercial composting facilities that accept these items.

Growth in sustainable packaging must be combined with sound policy so that products and infrastructure work together to reduce food and plastic waste going to landfills. I'm extremely proud that Novolex

can bring our expertise both as a manufacturer and recycler to multiple industry forums that work to shape policy and support the future direction of our industry. We will continue to engage in legislative activities focused on Extended Producer Responsibility (EPR) and other important regulation. The past year was foundational for EPR in North America, and the years ahead will be key to shaping circular systems.

Our people—the Novolex family—are what make our business successful from colleagues at work on the production floor to those in management. In 2022, we introduced new initiatives to deliver on our commitment to provide safe workplaces as well as a work environment that promotes diversity, equity and inclusion. We also launched the Novolex Broad-based Employee Award Plan. Provided at no cost to employees, the plan provides eligible employees at every level of the company an opportunity to participate in the growth and success of Novolex.

Together with the 10,000 members of our Novolex family and our customers, suppliers, and other stakeholders, we will continue developing meaningful goals and advancing our vision to provide more sustainable packaging solutions for the planet. I'm pleased to highlight our accomplishments in this report and look forward to the collaboration that will solve the challenges ahead.



STAN BIKULEGE

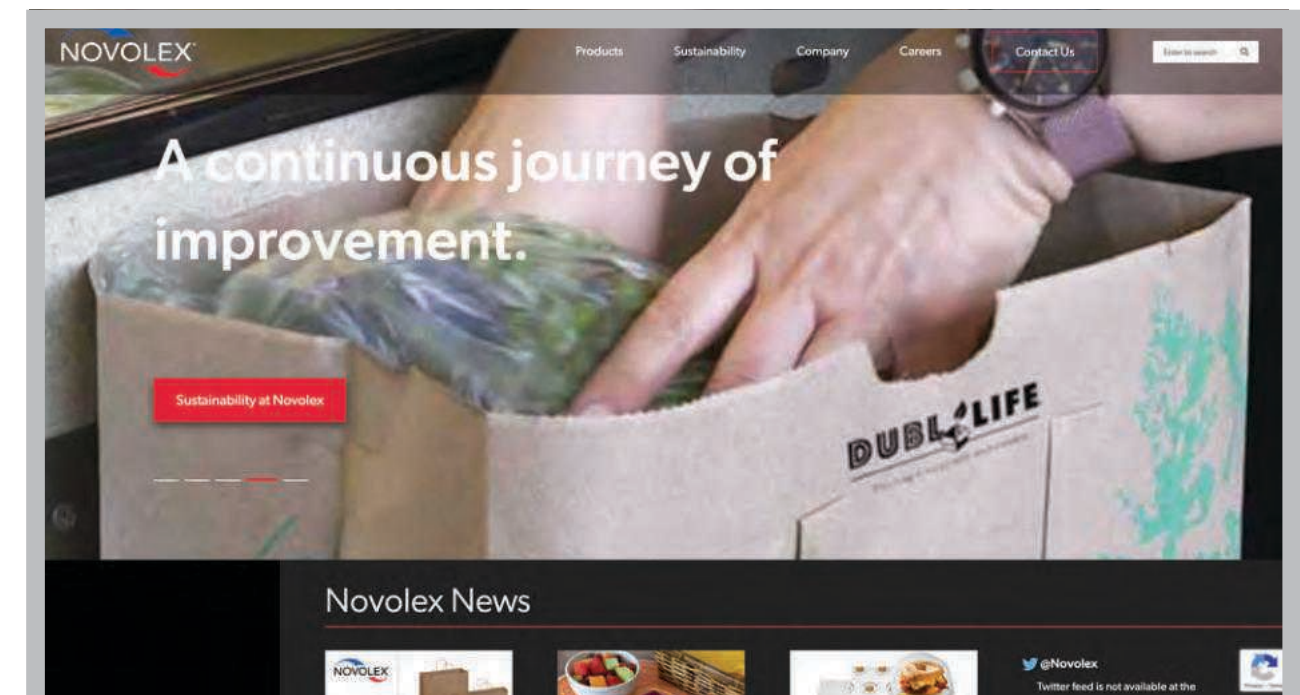


NOVOLEX APPROACH TO SUSTAINABILITY

THE LANGUAGE OF SUSTAINABILITY CONTINUES TO EVOLVE. In this report, we use the term sustainability to encompass the spectrum of expectations and reporting associated with environmental, social and governance (ESG) and similar characterizations that seek to encourage corporate responsibility and transparency. Throughout this report and particularly in our reported metrics, readers will find evidence of integrating a range of ESG considerations into our business, brands and culture.

Our report demonstrates our commitment to advancing our company's sustainability vision and reported metrics in alignment with leading industry reporting frameworks. This report is written in accordance with the Global Reporting Initiative (GRI), representing an increased level of disclosure and detail for fiscal year 2022. Our report also adheres to the Sustainability Accounting Standards Board's (SASB) Containers & Packaging industry standard. Our GRI and SASB Indexes can be found in the Appendix. If you have any questions or comments, please contact sustainability@Novolex.com.

The report covers the 2022 calendar year data, unless otherwise indicated. The 2020 materiality assessment continues to inform the focus areas of our reporting. However, we stay current by following emerging trends and issues and identifying additional disclosures and programs. For more information regarding our materiality assessment, see [Content Index](#).


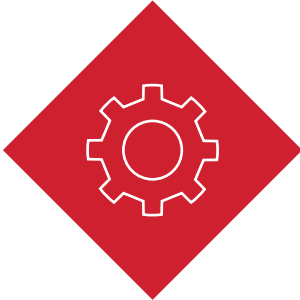



Novolex manufactures products from resin, fiber and multiple other bio-based materials for the food, retail, health and industrial markets. We employ more than 10,000 people at 57 manufacturing facilities and in administrative offices in North America and Europe. We serve customers that operate in two segments: Food & Delivery and Performance Solutions. To learn more about Novolex and the products we make to solve global challenges, visit us at [Novolex.com](https://www.novolex.com).

SUSTAINABILITY VISION, PILLARS AND METRICS

The Novolex vision for sustainability is to innovate more sustainable choices for our customers, operate responsibly and invest in our people and communities. We bring this vision to life every day through our ongoing focus on efficiency in our operations, and external engagement with customers, suppliers, communities and other industry partners.

As we continue the Novolex sustainability journey, we look for additional metrics with which to measure our performance, strive to improve our data collection methods and, where appropriate, develop targets to focus initiatives across our business. Since the publication of our first sustainability report in 2018, we have established various key performance indicators (KPIs) to monitor our progress and enhance our success in all aspects of sustainability. We have aligned our reported metrics to each sustainability pillar, as depicted in the visual to the right.

NOVOLEX SUSTAINABILITY PILLARS		
<div>PRODUCTS</div> <div></div> <div>Taking on a leadership role within the packaging industry by providing customers and their consumers with sustainable product solutions</div>	<div>OPERATIONS</div> <div></div> <div>Strive for low-impact manufacturing and integration of sustainability into operations excellence</div>	<div>PEOPLE & COMMUNITIES</div> <div></div> <div>Support our employees, their families and communities, and the consumers who use our products</div>
METRICS, KPIs AND TARGETS		
<ul style="list-style-type: none">◆ Percentage of raw materials from renewable, PCR or bio-based sources◆ Percentage of PCR in procured resin and fiber◆ Percentage of certified fiber◆ Percentage of revenue from products that are reusable, compostable or recyclable◆ Double PCR Recycling in North Vernon by 2024	<ul style="list-style-type: none">◆ Reduce GHG emissions from energy use in manufacturing by 30% per ton of production by 2030◆ Significant air emissions◆ Waste management and footprint	<ul style="list-style-type: none">◆ Safety: Total Recordable Incident Rate◆ Percentage of females and minorities in leadership positions◆ Employee demographics across operations

NOVOLEX VALUES

In addition to the Novolex sustainability vision, pillars, and metrics, we are publishing the Novolex values that guide our decisions and actions every day, from choosing new employees and providing safe workplaces to deciding on acquisitions and selecting commercial partners. Our values align with the seven *Novolex Guiding Principles* for good conduct and integrity embodied in the [Novolex Employee Code of Conduct](#).

New Metrics

For the second consecutive year we are publishing data on the end-of-life profile of products in accordance with a notable circular economy indicator, SASB: 410a.2, which measures the percentage of revenue generated from products that can be recycled, composted or reused. In addition, this year we improved measurement of waste generated in operations in accordance with GRI 305-3 across our global manufacturing footprint and now include that KPI under the “Operations” sustainability pillar. We’ve also made progress in expanding our “People” metrics, working extensively across different corporate functions to enhance disclosures on safety as well as diversity, equity and inclusion (DEI).



"Measuring our performance will be foundational to building a world-class Human Resources organization. We need to continue exploring the behavior-driven side of what we measure, and how it supports our success in key areas like DE&I, human capital and safety. These areas receive constant focus at Novolex and we expect to continue evolving our reporting and programs in these areas."

– LISA DULSKI, CHIEF HUMAN RESOURCES OFFICER

NOVOLEX VALUES	
Put safety first every day: The well-being of our employees, customers and communities is our top priority, and we are committed to a safe and healthy work environment. This means prioritizing safety in all of our actions and decisions, and continuously working to identify and mitigate potential hazards.	Behave with integrity and humility, and treat everyone fairly and with respect: We hold ourselves to the highest ethical standards and work to ensure everyone is respected, accepted and supported. This means being accountable for our actions, and doing the right and fair thing, even when it's difficult.
Embrace collaboration to support diverse opinions: We believe that working together as a team is the key to our success. This means valuing the unique differences of the people around us, actively seeking out the perspectives of others and ensuring everyone feels included.	Approach every task with a commitment to excellence and a winning entrepreneurial mindset: We strive to be the best in everything we do, from the products and services we offer to the way we treat our customers, business partners and each other. This means continuously improving ourselves and our work, and never being satisfied with mediocrity.
Understand and act on our responsibility as environmental stewards: We are committed to constantly innovating and championing sustainable products, manufacturing practices and lifestyles. This means working with each other, our neighbors, customers and other stakeholders to support a circular economy.	

GOVERNANCE

The Novolex Board of Directors is the highest governing body with oversight of our progress and impact on environmental, social and governance (ESG) issues. Board members have extensive experience in the global packaging industry, finance, global supply chain and ESG-related disciplines relevant to Novolex operations and that are applicable to stakeholders. During quarterly meetings, the Board receives and evaluates the management of the organization’s impacts on the economy, environment and people, makes recommendations and receives follow-up on implementation at subsequent meetings.

Board Composition

There are eight members of the Board, which was established in April 2022, including Chairman and CEO Stanley (Stan) Bikulege. There are three standing committees of the Board: the Audit Committee, the Compensation Committee and the Sustainability & Environment, Health and Safety (S&EHS) Committee.

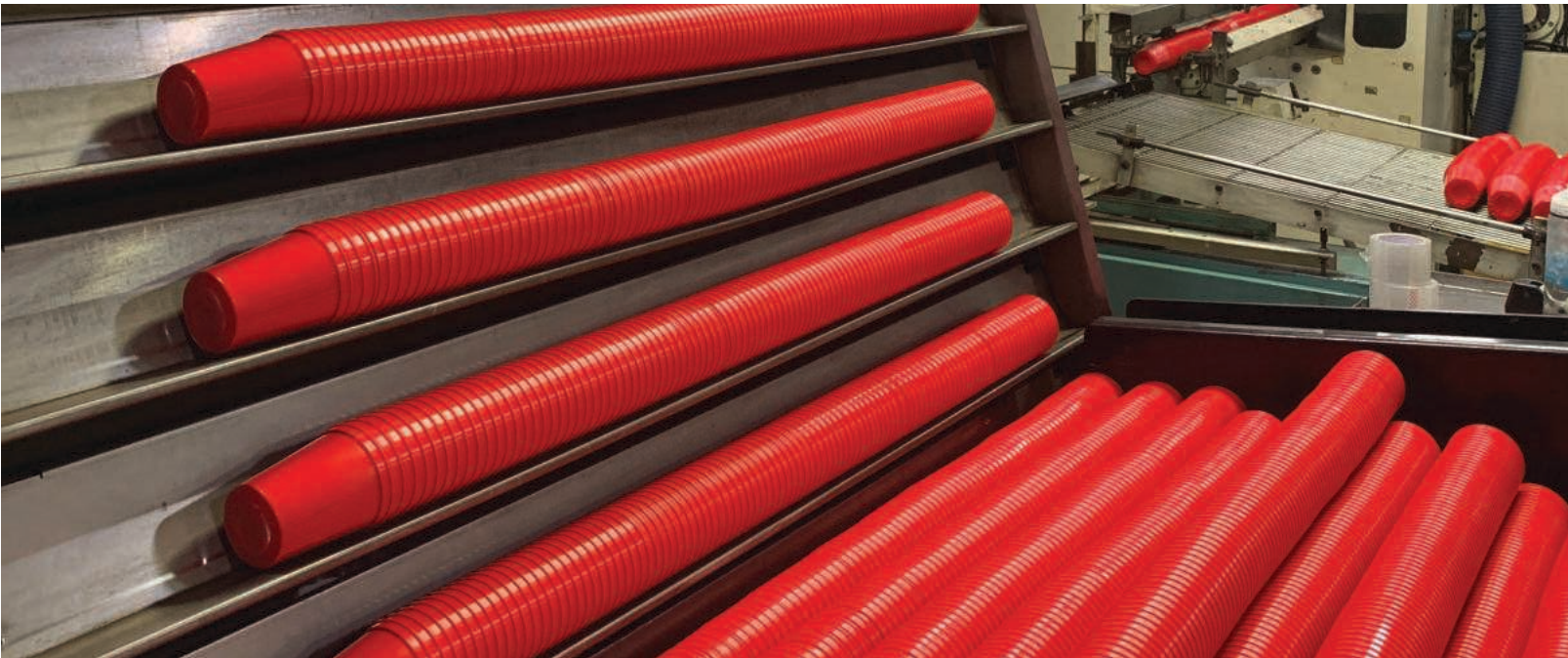
The S&EHS Committee is responsible for the company’s strategy and performance around ESG matters, including the company’s advancement of key performance indicators that align with the three Novolex sustainability pillars: products, operations, and people and communities. The S&EHS Committee is comprised of three members of the Board. The committee provides direction on evolving expectations that could affect the company's awareness of and performance against its ESG goals as well as assesses the impacts of ESG projects on stakeholders. The committee meets quarterly to receive updates from the Novolex Senior Leadership Team (SLT), including the Chairman and CEO, and other company subject matter experts, on ESG-related topics. In 2022, the committee considered a number of topics including efforts to meet the company's greenhouse gas emissions reduction target, product sustainability strategy, employee health and safety metrics, employee training and development, and expectations of stakeholders regarding the circular economy, among other subjects. The [Products](#), [Operations](#) and [People and Communities](#) sections of this report provide more information on these topics.

Leadership

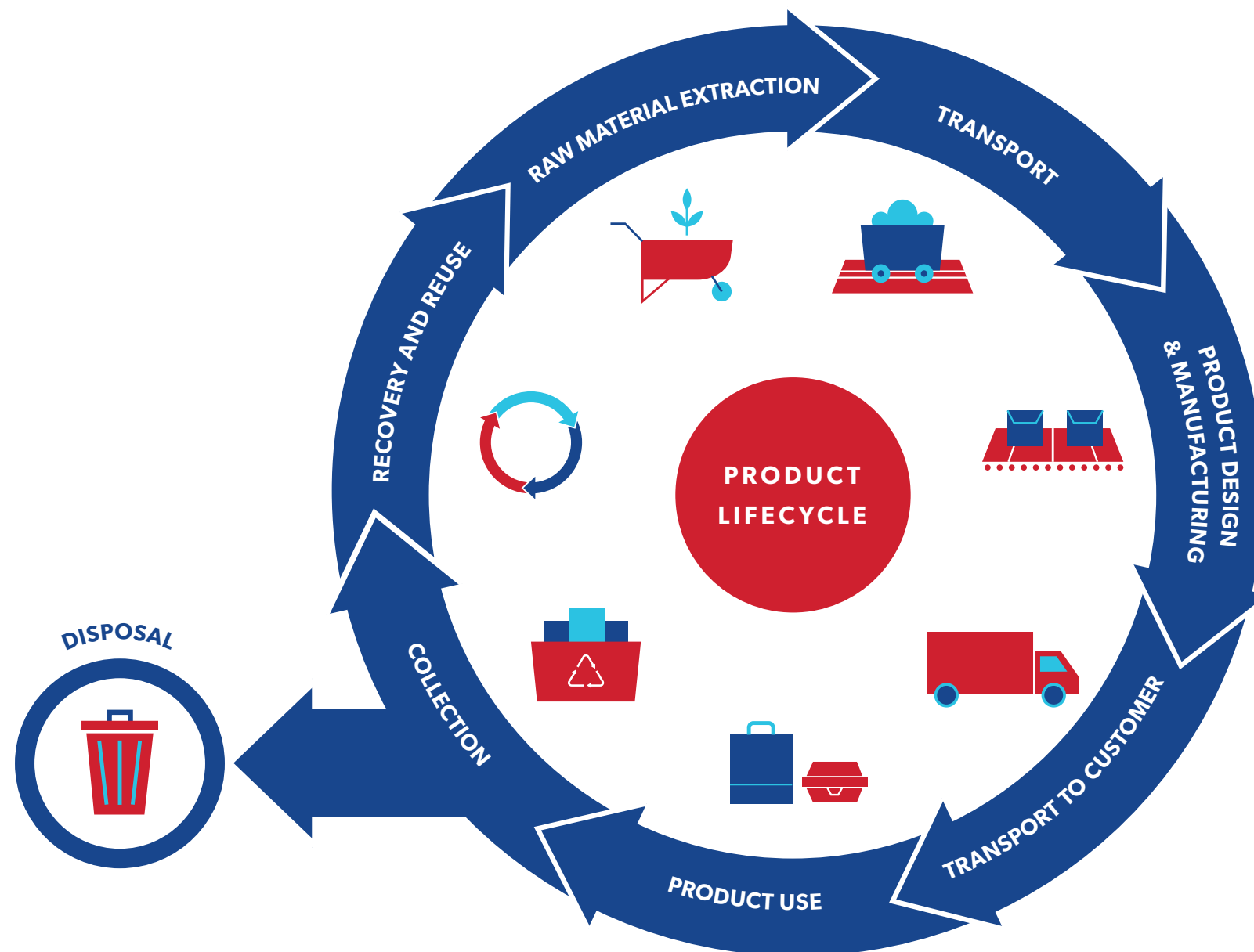
The [Senior Leadership Team](#) (SLT) at Novolex has nine members, including the Chairman and CEO, the presidents of the Food & Delivery and Performance Solutions business segments, the Chief Financial Officer, and other function heads responsible for Technology, Procurement, Human Resources, Legal and Corporate Affairs. Together, they are responsible and accountable for identifying and executing sustainability projects that advance Novolex ESG goals. The SLT holds weekly meetings and conducts comprehensive monthly business reviews, where the team discusses topics that pertain to the company’s ESG performance. Additionally, the SLT discusses a range of ESG topics during other functional and business planning meetings as needed. The Senior Vice President of Corporate Affairs on the SLT coordinates all sustainability initiatives and objectives, while also receiving support from a director who specializes in sustainability.

Partners

In 2022, Apollo Global Management (“Apollo”) acquired majority ownership of Novolex from Carlyle, with Carlyle maintaining minority ownership. Both Apollo and Carlyle uphold a strong commitment to addressing ESG initiatives in their portfolio companies. With the support of our partners, Novolex will continue to drive sustainability progress.



ACROSS THE NOVOLEX PRODUCT PORTFOLIO, we take a holistic view of the total lifecycle of our products, from the selection of raw materials and product design to the impact of manufacturing on the environment to the ways our products can be used and disposed of. Our innovation teams work to address a range of functional requirements and sustainability objectives that meet the needs of our customers and their consumers. In partnership with our customers, we strive to identify raw materials and product designs that offer balance between societal needs, greenhouse gas emissions and product disposal.



PRODUCTS

PRODUCT CARBON FOOTPRINT (PCF)

As verifiable carbon data becomes increasingly important to customers, we are enhancing our ability to provide product-level carbon data in support of customer purchase decisions. Novolex is now using software designed to prepare product lifecycle analyses (LCA) to quantify the benefits or impacts of different raw material and product design decisions. These calculations rely on industry-leading lifecycle inventories to estimate the carbon impacts of packaging and other products. In 2022, we conducted analyses for nearly 40 products across our portfolio, giving us an increasing understanding of the types of raw materials, products and supply chains that reduce emissions across the product value chain. We share this information with customers so they can make well-informed, data-driven product decisions that support their sustainability goals and targets.

Our use of these tools and ability to collect and use primary data will increase over time, further improving the accuracy and completeness of our product carbon footprint work.

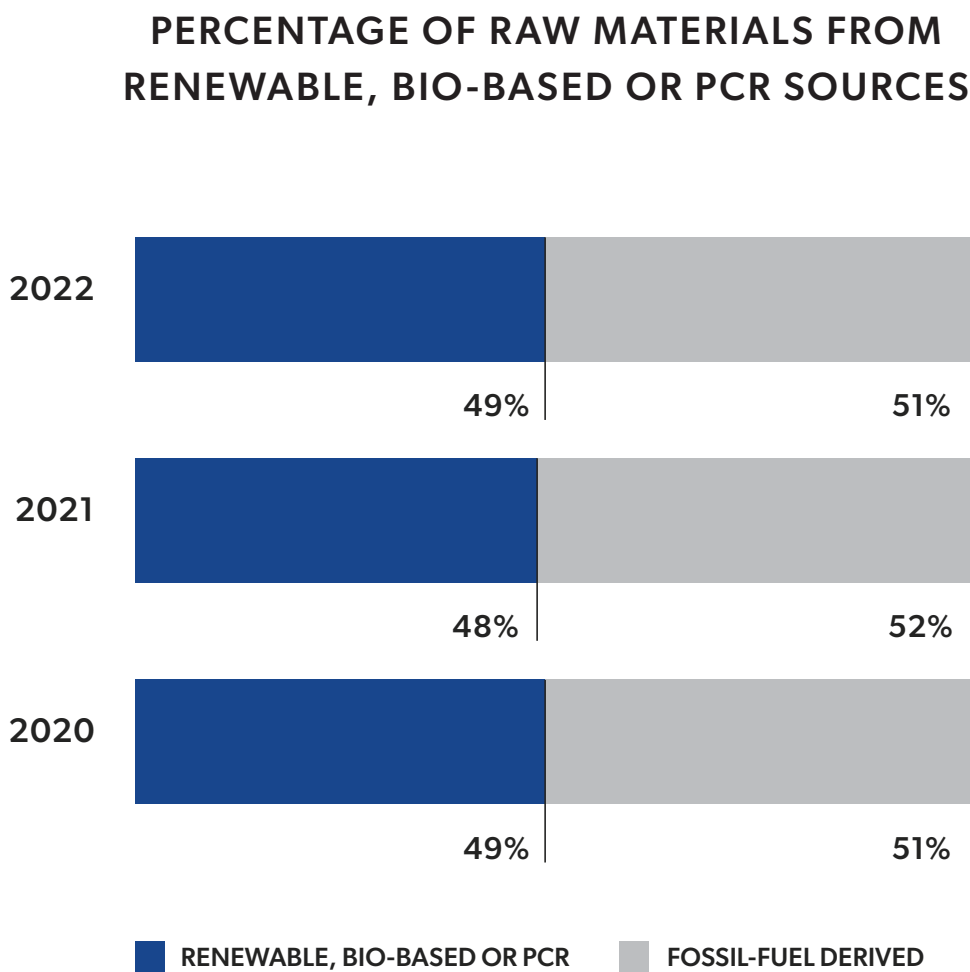
The value of these efforts is demonstrated by our capability to provide best-in-class solutions across multiple product categories. We can offer customers solutions that reduce their greenhouse gases and contribute to the circular economy with products that use recycled or renewable content and are designed to be recycled or composted. This approach is good for society and our business. As the demand for more environmentally preferable products increases, we are well positioned to take advantage of this growth.

RAW MATERIALS

OUR ABILITY TO FULFILL THE NOVOLEX BRAND promise of choice, innovation and sustainability begins with our selection of raw materials. Over the years, we have expanded the materials we use to reflect emerging technologies and customer needs. In 2022, 49% of Novolex products used raw materials that came from renewable, bio-based or post-consumer recycled (PCR) sources.

While resins from fossil fuels and fiber from forests remain a significant percent of our raw materials, we are at the forefront of using bio-based and renewable materials that can be substituted for traditional sources. These materials include a range of bio-based resins as well as fiber that comes from processed sugarcane (bagasse), bamboo and other sources. Our range of compostable and recyclable products from renewable, bio-based and post-consumer recycled (PCR) sources differentiates us in the market and demonstrates to our customers that we are striving to be best in class.

49% of RAW MATERIALS
are from **RENEWABLE,**
BIO-BASED or **POST-CONSUMER RECYCLED (PCR) SOURCES**



BIO-BASED RESINS

Bio-based resins such as PLA and PHA, also referred to as bioplastics or bioresins, are polymers derived from plants such as corn and sugarcane. They provide the packaging industry and our customers with a renewable and often compostable option that features many of the same performance benefits as conventional resins derived from fossil fuels. Novolex is engaged in testing the limits of these resins as the market demand for renewable, compostable and bio-based alternatives continues to grow. We can now use these materials in several of our facilities to produce hinged containers, cups, straws, waste can liners and produce bags.

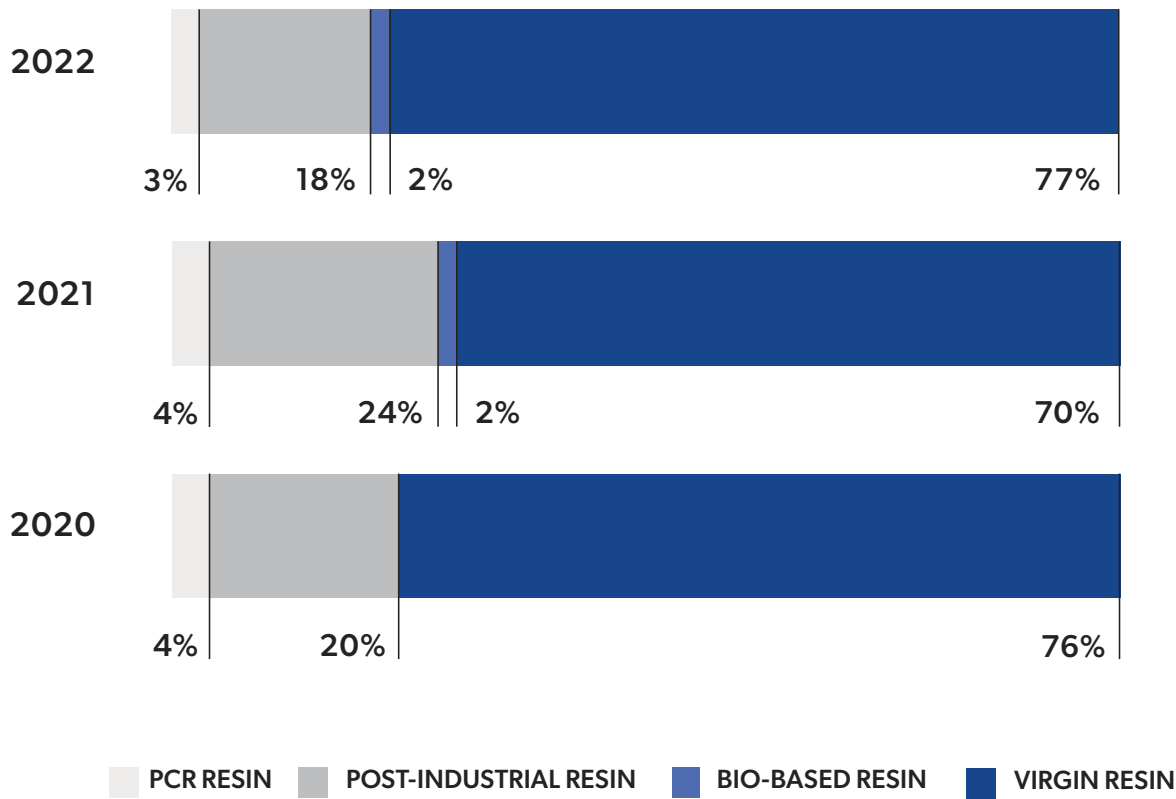
**For our broadest raw material metric (SASB: 410a.1), we treat post-industrial (PI) content as “virgin” content but separate it from virgin content in our resin recycled content metric (GRI 301-2) because it can also include purchases of recycled resin made from post-industrial sources.*



RESIN SOURCING

FOR THE SECOND CONSECUTIVE YEAR, Novolex increased the use of bio-based resins across our portfolio*. In 2022, recycled content from both post-consumer (PCR) and post-industrial (PIR) sources was 21% of total resin purchased. While North American PCR resin volume increased, total PCR declined slightly, from 4% in 2021 to 3% in 2022, due in part to supply challenges following the introduction of the UK plastics tax in 2022.

2022 RESIN SOURCING



**2% is the same figure reported in 2021. Total bio-based resin pounds and the percentage of our total resin volume made up by those resins both increased in 2022.*

POLYETHYLENE (PE) FILM CIRCULARITY

In 2022, we announced a \$10 million investment to increase recycling capacity at our North Vernon, Ind., recycling facility. With this investment, we’ve set a target to **double** the volume of PCR PE films that we recycle in North Vernon by the end of 2024.



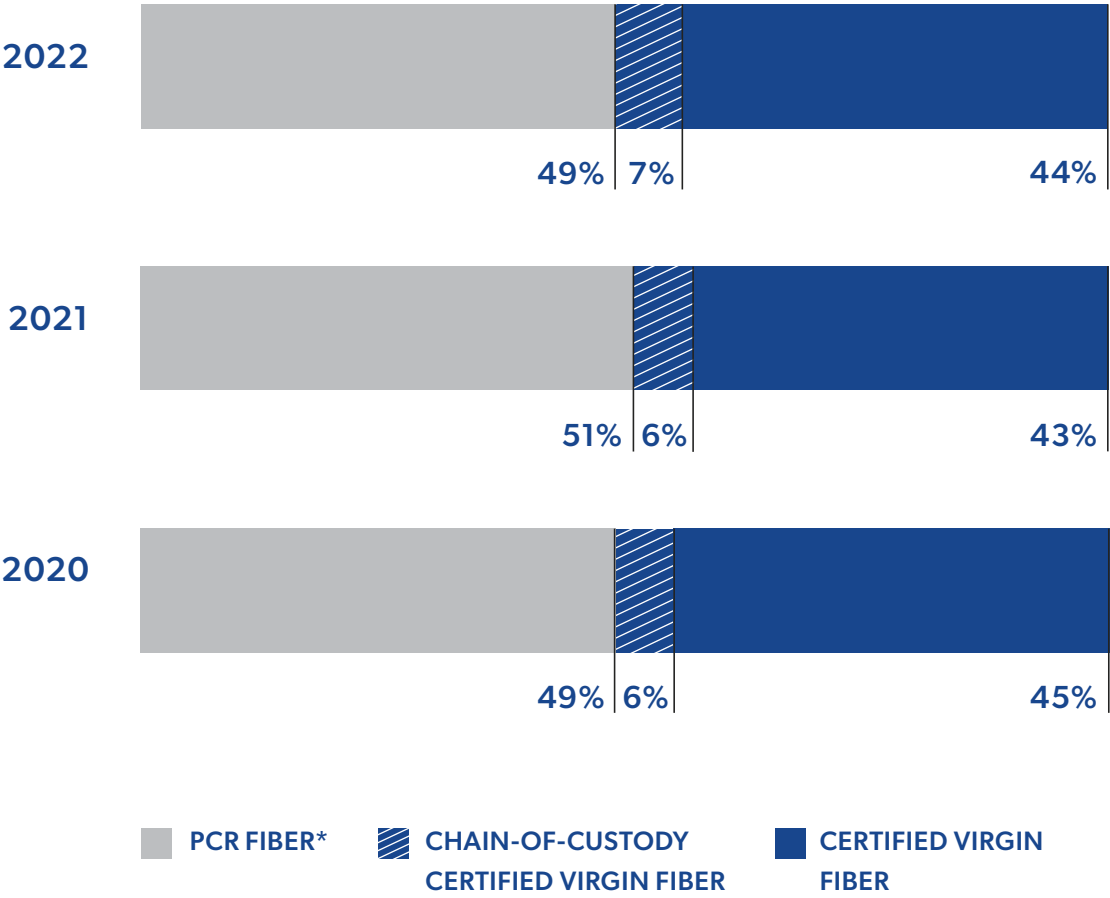
“Our investment in recycling capacity in Indiana reflects the Novolex commitment to support the circular economy. The technology will reduce waste and provide much-needed recycled content that we will be able to use in our products.”

– ADRIANNE TIPTON, PhD
CHIEF TECHNOLOGY OFFICER

FIBER SOURCING

IN OUR FIBER BUSINESS, shifts in our paper supply chain also led to a slight drop in PCR utilization, to 49% in 2022 from 51% in 2021. More than 99% of all fiber we purchase to produce paper products comes from certified sources.

2022 FIBER SOURCING



*PCR is from either Chain-of-Custody or Certified Sources. This figure may include 5% or less of non-PCR content.

SUSTAINING FORESTS

One of the ways Novolex aims to reduce the impacts of our products on the environment is by obtaining materials purchased from suppliers who receive certification from the Forest Stewardship Council® (FSC®), Sustainable Forestry Initiative® (SFI®), the Programme for the Endorsement of Forest Certification™ (PEFC™) and Bonsucro®, among other certification organizations. Our Eco-Products business aims to have beginning-of-life certifications for its top substrates, including sugarcane/bagasse, by 2025.

Chain-of-Custody

In 2022, 7% of total virgin fiber volume was Chain-of-Custody certified, representing a 1% increase over 2021. We are encouraged by this progress as our growth in Chain-of-Custody fiber purchases outpaced our overall fiber volume growth for the first time since we began publicly reporting this metric. Chain-of-Custody certification provides additional assurance that fiber comes from forests that are managed to ensure a renewable resource.

Molded Fiber

A growing number of Novolex products are made from molded fiber, a raw material category that includes materials such as bamboo, wheat straw, miscanthus, bagasse and more. Bagasse is a mainstay in both our Vanguard® and Nourish™ brands from Eco-Products® and Vegware™, respectively. Not only is bagasse a renewable resource, but by using the by-product of sugar production, we reduce waste and enable foodservice packaging to be composted.

PARTNERING WITH LEADING COMPOSTING ORGANIZATIONS

With the rise of consumer demand for sustainable lifestyles, composting has grown in popularity and the call for expanding commercial composting has risen as well. Even though progress in the growth of commercial composting has not been fast enough for some, it has expanded waste management options for consumers. Novolex works to be ahead of demand for compostable products by expanding our compostable product portfolio and exploring different approaches to address composter challenges, including issues with contamination and the performance of certified compostable products in their compost process. We continue to work closely with key industry groups such as the US Composting Council, the Biodegradable Products Institute (BPI) and the Compost Manufacturing Alliance (CMA) to bring knowledgeable stakeholders together to help better understand rising challenges and find collaborative solutions.

PAPER AND FIBER PRODUCT INNOVATION

THE RANGE OF CERTIFIED INDUSTRIALLY COMPOSTABLE PRODUCTS available in our portfolio has increased markedly in response to demand from our customers and their consumers. Expanding the availability of compostable products can drive greater interest in packaging that is certified for commercial composting and lead to more investment in commercial composting infrastructure.

TACKLING FOOD WASTE

Creating food packaging that can facilitate food waste diversion away from landfills is extremely important because food waste is one of the largest contributors to global methane emissions. Novolex seeks commercially compostable certification to assure our customers and their consumers that applicable products meet industrial composting standards and can be composted at commercial facilities. Our New Product Development teams partner with customers to design products for commercial composting and advise on the best methods of sortation and labeling to educate consumers.



Nourish molded fiber containers: Our Vegware business based in the U.K. introduced Nourish™, a line of molded fiber plates and bowls made from bagasse. Similar to Vanguard®, a molded fiber product sold by our Eco-Products business based in the U.S., Nourish is made without added PFAS that had traditionally been used to resist oil and grease absorption. Both Nourish and Vanguard are certified commercially compostable. In 2022, Eco-Products expanded the choice of Vanguard products, which were introduced in 2019.



Nourish Molded Fiber Coffee Cup Lids: Commercially compostable molded fiber cup lids were introduced by Vegware under the Nourish brand and are made with no added PFAS.



Paper Cutlery: an award-winning alternative: Vegware's new paper cutlery range of products is a solution in markets that ban use of plastic cutlery. In 2022, Vegware cutlery received the Packaging Award at the Free From Expo in Barcelona and was runner-up at the Sustainable Food Awards in Amsterdam.



Biodegradable Products Institute (BPI) certification: In 2022, the Novolex Duro® brand announced it had achieved BPI certification for numerous products in its Dubl Life® line of paper bags and sacks. The products are among the first on the market to receive this leading certification, further expanding the portfolio of certified compostable products offered by Novolex.



*Not in backyard; Composting programs for this bag may not exist in your area.

The use of the dual **How2Recycle®/How2Compost®** label is designed to increase proper waste disposal by including clear instructions that direct consumers to discard our products into the correct waste stream.

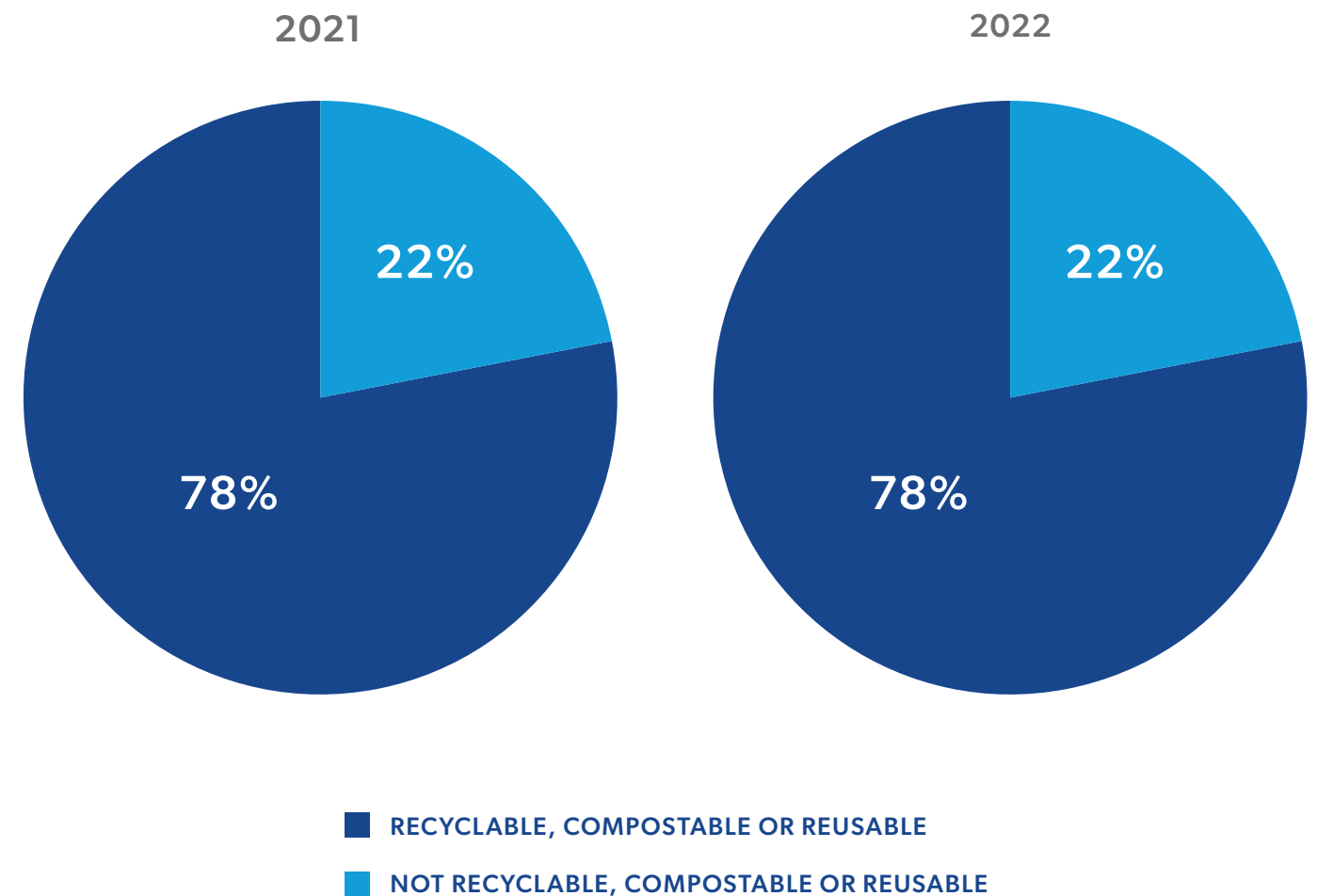
RECYCLABLE, COMPOSTABLE OR REUSABLE PRODUCTS



IN 2022 APPLICABLE NOVOLEX REVENUES FROM PRODUCTS that were recyclable, compostable or reusable was 78%, the same as in 2021.

To measure revenues from products that can be recycled, composted or reused in accordance with SASB metric 410a.1, for products sold in North America we use How2Recycle® definitions managed by the Sustainable Packaging Coalition (SPC). Those classifications include “Widely Recyclable,” “Check Locally,” “Store Drop Off” and “Not Recyclable,” which in turn draw on the U.S. Federal Trade Commission (FTC) and Canadian Competition Bureau claims guidance. For products sold in Europe, local regulatory agencies provide definitions based on the availability of collection and processing infrastructure. Compostable or reusable products included in this metric must have an accompanying third-party certification, such as certification as compostable by BPI, or have been tested to verify performance consistent with accredited industry standards.

RECYCLABLE, COMPOSTABLE OR REUSABLE



*A share of Novolex products are excluded from the scope of the SASB metric because they do not appropriately classify as recyclable or compostable. Examples of these products include trash can liners and materials used to manufacture products used in construction and other durable applications. These products make up approximately 14% of Novolex revenues.

NOVOLEX IS WORKING TO INCREASE THE SUSTAINABILITY OF OUR PRODUCTS BY DESIGNING FOR RECYCLING, COMPOSTING AND REUSE.



MONOAIR FRUIT CONTAINERS

Novolex now manufactures a mono-material plastic soft-fruit container using our revolutionary MONOAIR™ cushion technology. The punnets, which use an integrated cushion to support recycling, are available in up to 100% PCR content. In 2022, the Waddington Europe product line was expanded to include new punnets in large rectangular, square, and standard rectangular versions.



PIRANHA RECYCLABLE CONTAINERS

Piranha™ is an innovative recyclable tray for meat, fish and poultry products for customers in Europe. The Piranha brand tray seals using a series of raised teeth that run around the sealing flange instead of requiring a layer of polyethylene or adhesive. As a mono-material package, the tray is fully recyclable.



ROLLSTAR EZ OPEN PRODUCE BAG

RollStar® EZ Open™ Produce Bags come in a wide variety of sizes and gauges, including versions certified as compostable by BPI. The product utilizes a proprietary recipe that makes them easy to open, simplifying life in the fresh fruit and vegetable department.

NOVOLEX IS WORKING TO INCREASE THE SUSTAINABILITY OF OUR PRODUCTS BY DESIGNING FOR RECYCLING, COMPOSTING AND REUSE.



PHA STRAWS

Straws made from polyhydroxyalkanoate (PHA), a plant-based plastic derived from canola oil, received BPI certification in accordance with industrial composting standards. Not only are the straws themselves compostable, but they come in packaging also made with PHA, enabling both the product and its packaging to be composted.



FILM INNOVATION

Novolex partners with customers to design polyethylene (PE) film packaging for compatibility in film recycling streams. HR Spinner, a leader in produce packaging for the retail segment, aims for high-performance packaging that supports freshness and ease of use by consumers. To meet customer objectives, the all-PE flexible apple bag pictured above required an innovative approach to design a zip-seal closure that would also be compatible with store drop-off recycling offered at grocers and retailers. Through months of testing, research and development, Novolex and HR Spinner pioneered a leading, more sustainable product design to meet the needs of both retailers and consumers.



PCR MAILER

In 2022, we launched a mailer made with 80% PCR content. This is the highest percentage of PCR content for any polyethylene film product in the Novolex portfolio. Products like this show that Novolex is continuing to push the boundaries of what is possible with PCR in thin-gauge films.

POLICY AND PARTNERSHIPS

NOVOLEX ADVOCATES FOR RESPONSIBLE LEGISLATION, REGULATION AND STANDARDS that will support the circular economy and create a stable, transparent and accountable marketplace for the packaging sector. The past year saw ongoing and new requirements and proposals that could affect the packaging industry. Three U.S. states passed Extended Producer Responsibility (EPR) legislation designed, among other features, to collect fees from packaging brands and which would be used to build recycling infrastructure. Two states passed legislation setting minimum amounts of recycled content in selected plastic products that include reporting requirements from manufacturers attesting that they met the thresholds. The UK Plastics Tax began setting a minimum 30% recycled content for new plastic packaging. Canada enacted regulations to restrict the sale of selected plastic packaging products. Finally, efforts to develop a global plastics treaty got underway with the first session of the Intergovernmental Negotiating Committee convening in January 2023.



HOW WE ENGAGE

As a leading producer of packaging products, we have a responsibility to promote well-crafted policies that will result in increased use of recycled and renewable content and proper end-of-life management of packaging. Our investments year over year to increase our own recycling capacity and expand the number of our products that can be recycled and composted attest to what we can do as a manufacturer. We also know that we must work with others to fulfill our ambitions at scale. Establishing reasonable targets for minimum use of recycled content, creation of additional recycling and composting infrastructure, and clear and uniform product labeling to promote proper disposal of packaging can only be achieved by working with multiple stakeholders. Sound public policy can provide transparency and accountability and lead to a stable marketplace. To achieve these and other goals we work with leading industry associations and non-governmental organizations (NGOs) to amplify our voice. Our combined efforts focus on educating policy makers, communities, media, NGOs and other stakeholders about our goals and the complexities that must be understood and overcome to create sound and achievable policy. Even the most well-intentioned policy proposals can benefit from the technical expertise and experience manufacturers can bring to the table.

Reusable containers in development

Many of our reusable product offerings are due to regulation. Choice and innovation are key to Novolex. Foodservice clients all around the world are exploring solutions for reusable cups and containers. We continue to work on multiple projects to develop a Novolex reusable offering, making the most of our product development and manufacturing expertise to best serve the changing needs of our customers and their consumers.

OPERATIONS

GREENHOUSE GAS REDUCTION TARGET

AT NOVOLEX, OUR PRODUCT AND MANUFACTURING SUSTAINABILITY PROGRAMS COMBINE TO PLAY A VITAL ROLE in our ongoing commitment to reducing greenhouse gas (GHG) emissions from manufacturing. We understand our responsibility to contribute to the global effort to mitigate climate effects, including the escalation of global temperatures, sea level rise and extreme weather events. In 2019, we established a companywide baseline for our global emissions resulting from energy and natural gas use in our facilities, supporting our ability to set targets focused on achieving measurable progress. We are on track to achieve our target due to a series of planned investments in energy efficiency including LED lights, new boilers, chillers, regenerative thermal oxidizers (RTOs) and more.

We also purchase renewable energy credits (RECs) and engage in power purchase agreements (PPAs) to reduce our carbon footprint from operations and supplement progress resulting from our capital investments.

While we move forward to reduce Scope 1 and 2 emissions, in 2022 we also took initial steps to build a comprehensive Scope 3 GHG inventory. With a growing foundation of operational data and public metrics that indirectly report on areas relevant to Scope 3 emissions from our upstream and downstream supply chains, we are on a path towards integrated target-setting that encompasses all three scopes. We will remain focused on these objectives as they align closely with the future sustainability of our industry and expectations from our customers and other stakeholders.

NOVOLEX TARGET

Achieve a **30% REDUCTION** in **GLOBAL EMISSIONS** per ton of production by **2030**. This target is tied to **KPIs** outlined in our **SUSTAINABILITY-LINKED FINANCING**, meaning Novolex must achieve annual progress that is assured by a third party in order to renew discounts on our debt financing.

AT NOVOLEX, we take pride in reducing our impact on the environment across our manufacturing operations. One of our values is environmental stewardship. We focus on raising environmental awareness among members of our Novolex family and creating a culture that drives measurable performance improvements to reduce our environmental footprint. We assess progress through an increasing number of operational KPIs focused on using recycled content, driving energy efficiency to reduce emissions, reducing the amount of waste sent to landfills, and more.



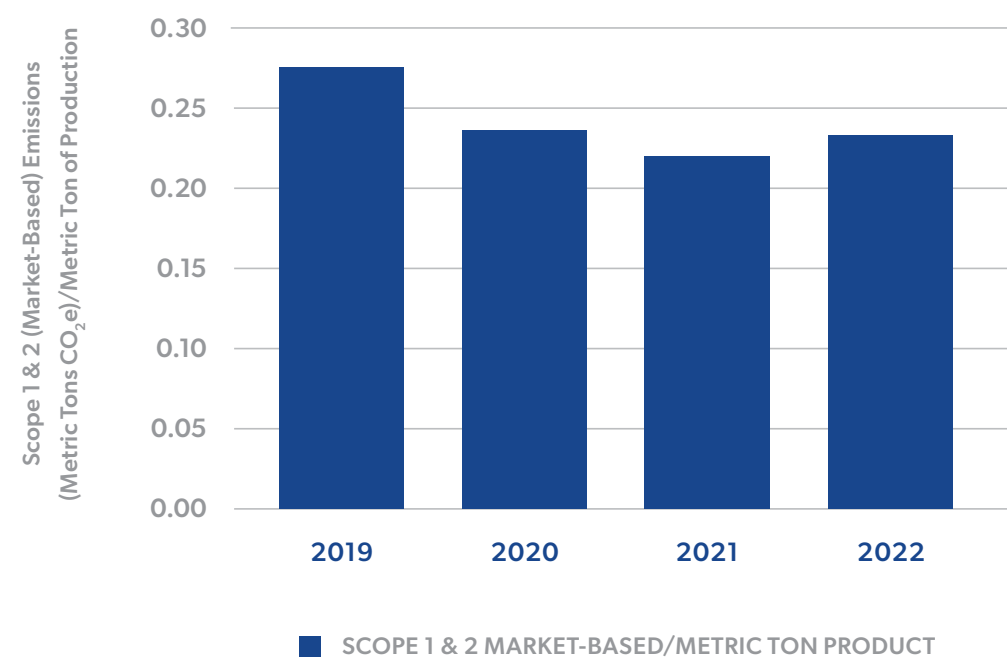
ENERGY AND EMISSIONS

ENERGY USE IS A SIGNIFICANT DRIVER OF EMISSIONS at our manufacturing facilities. The majority of our energy use is from natural gas and electricity. We are proud of our early progress in reducing emissions intensity. However, we recognize that our 2022 data demonstrated a decline in our previous trend. This was due to multiple factors including the expiration of renewable energy credits (RECs) we had purchased for specific sites in our portfolio. In 2022 and into 2023, we are making significant progress on more detailed, multi-year strategies that will support achievement of our 2030 target and the annual KPIs set forth in our sustainability-linked financing. This strategy will focus on improving energy efficiency in operations and reducing reliance on RECs to achieve our target.

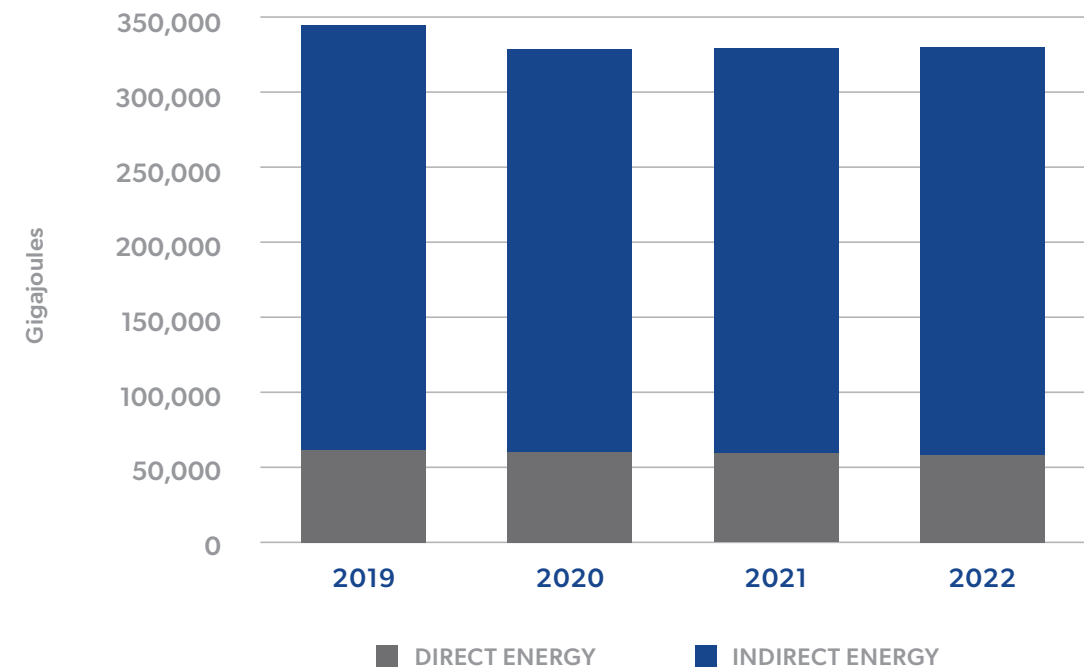
Customer Engagement

Novolex GHG reduction objectives align with those of many of our customers, who prioritize suppliers that share their sustainability goals. In addition to Product Carbon Footprint (PCF) analyses, we regularly provide allocated Scope 1 and 2 emissions data to customers, which helps them measure emissions resulting from their purchased product volume. This data is increasingly relevant to customers as they track their supplier emissions to assess their own Scope 3 emissions.

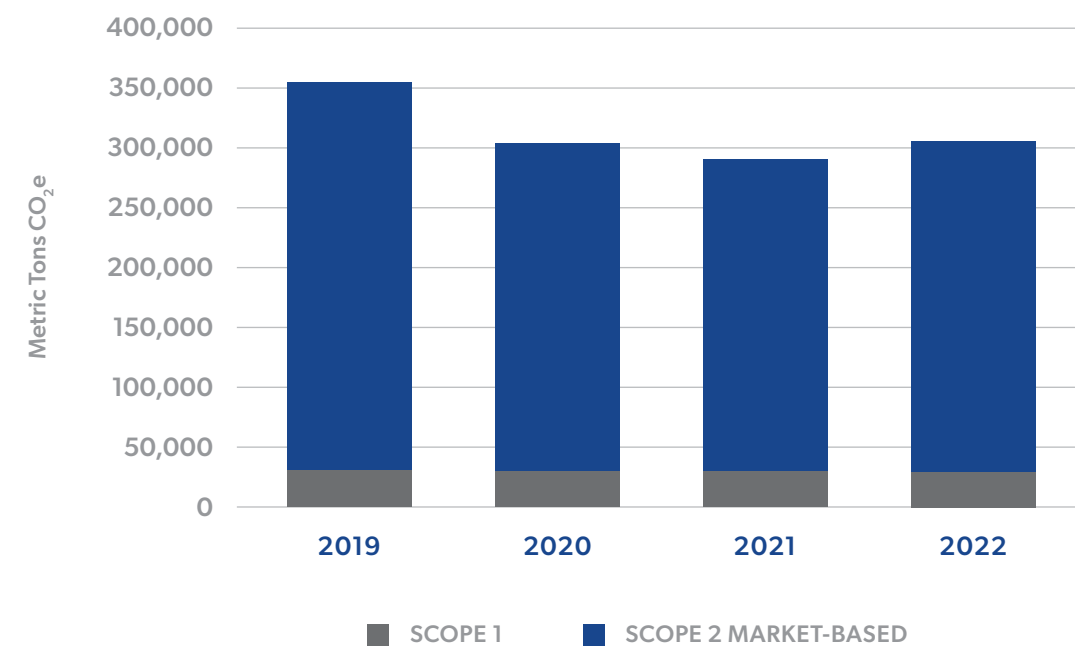
GHG EMISSIONS INTENSITY



TOTAL ENERGY CONSUMPTION



SCOPE 1 & 2 GHG EMISSIONS



AIR, WASTE AND WATER

IN ADDITION TO MOVING TOWARD OUR 2030 GHG REDUCTION TARGET, we are advancing our environmental monitoring and data collection efforts across other areas of our operations. As Novolex grows, we are prioritizing efforts to better understand and quantify our operational environmental impacts. Managing processes and materials throughout our operations is critical to reducing air emissions, waste generation and water consumption.

The Director of Environmental Compliance oversees operational impacts across 57 manufacturing sites. Working with local environmental, health and safety (EHS) managers, we identify air, waste and water impacts specific to each of our facilities and develop action plans to mitigate environmental impacts. In 2022, we made significant progress toward developing a companywide waste-to-landfill metric. Additionally, we have made progress in reducing air emissions through investments in innovative equipment designed to manage volatile organic compounds (VOCs).



AIR EMISSIONS

AT NOVOLEX, we monitor our air emissions permits, focusing on nitrogen oxides (NOx), sulfur oxides (SOx), volatile organic compounds (VOCs), and particulate matter (PM). Emissions released by Novolex facilities vary depending on their specific processes. VOC emissions commonly arise from the use of inks for product printing, while NOx and SOx emissions result from the use of natural gas during operations.

In 2022, air emissions decreased compared to 2021 levels. This was due in part to a second regenerative thermal oxidizer (RTO) added in 2022 to our location in Yakima, Wash., which reduced VOC emissions at the plant. Novolex contributed a \$2 million investment towards this second RTO to support ongoing emissions reduction initiatives.

AIR EMISSIONS (METRIC TONS)				
	2019	2020	2021	2022
NOx	25	24	26	24
SOx	0.15	0.14	0.16	0.15
VOC	586	608	623	484
PM	*	*	*	1.85
*Data not collected for 2019, 2020 or 2021.				

NON-HAZARDOUS WASTE

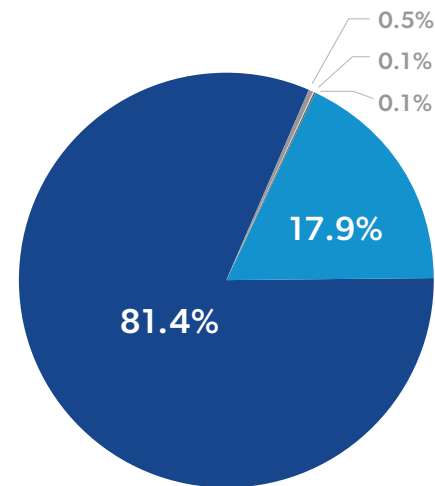
AS WE COMMITTED to in our 2021 sustainability report, in 2022 Novolex implemented a comprehensive waste-to-landfill measurement program to enhance our monitoring and reduction of different waste streams. To support this endeavor, we established partnerships with Roadrunner Recycling, Valpak and Casella Waste Services. These partnerships enable us to track the quantity of waste sent to landfills and identify ways to divert more waste from landfills. In this year’s report we are pleased to share our progress.

Since we started our **WASTE REDUCTION PROGRAM**, Novolex has diverted over **5 MILLION POUNDS** of waste that would have otherwise been sent to landfills.

For the first time we are able to report our waste disposal metric: 82% was recycled, and almost all of the rest, or 18%, was sent to landfills during 2022. The scope of our reported data includes facilities in the U.S., U.K., Mexico, Ireland and the Netherlands. It does not include Canadian sites this year. For sites in the U.S. and Mexico where data was unavailable, a waste intensity factor of 2.42 pounds per square foot was used to estimate waste at those facilities. Waste disposed of via other methods was not estimated. We will continue efforts to enhance the completeness of our reported data.

NON-HAZARDOUS WASTE

- RECYCLED
- LANDFILLED
- COMBUSTED
- COMPOSTED
- DIGESTED



REDUCING WASTE: CUSTOMER PALLET REUSE PROGRAM

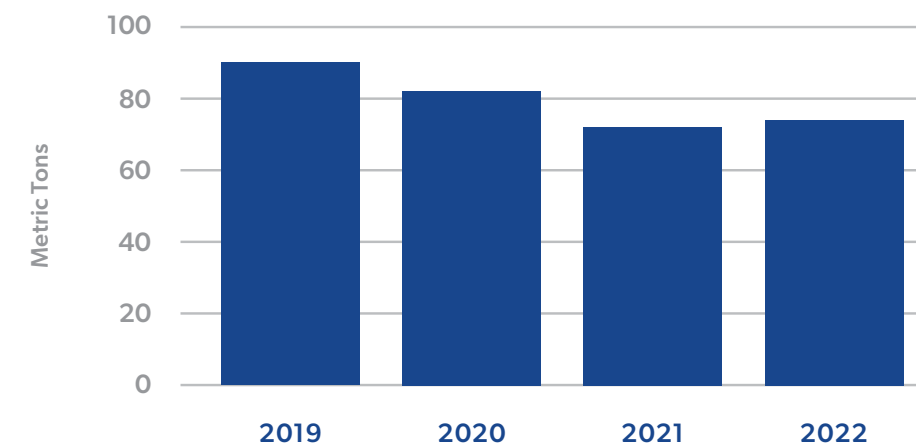


Johns Manville is a leading manufacturer and marketer of premium-quality insulation and commercial roofing. The company is also a customer of the Novolex Shields division, purchasing specialty “hooder” film to support product distribution. In 2022, the operations team at Johns Manville identified an opportunity to reuse the extra-large pallets used to ship products from the Novolex Coldwater, Ohio, facility to Johns Manville’s Hazelton, Penn., plant. After full pallets arrive at the Hazelton plant, they are collected and stored. Once enough pallets accumulate to fill a truck, the pallets are sent back to the Novolex Coldwater facility where they are refilled with the product to be shipped back to the customer. The process then repeats, reducing the unnecessary use of new pallets. Importantly, this partnership reduces material use and results in a lower cost of products to the customer.

HAZARDOUS WASTE

NOVOLEX OPERATIONS GENERATE both non-hazardous and hazardous waste. Ensuring the proper tracking and management of hazardous waste is essential to mitigating environmental impacts, maintaining safe operations and safeguarding human health. As part of the Novolex comprehensive waste reporting effort, we monitor hazardous waste generation across our facilities where tracking and management are mandated due to both the volume of waste generated and regulatory requirements. Furthermore, we ensure recently acquired facilities implement initiatives to reduce hazardous waste, such as solvent capture and reuse programs. Together with the development of Novolex broader waste metrics, we are working to gather additional data on hazardous waste management to provide a comprehensive overview of companywide hazardous waste practices.

HAZARDOUS WASTE



WATER

WHILE WATER REPRESENTS A RELATIVELY SMALL PORTION OF THE OVERALL ENVIRONMENTAL IMPACT in our manufacturing facilities, we seek opportunities to reduce water consumption and improve water quality. Across Novolex manufacturing facilities, we understand that our two recycling facilities and injection molding operations are more water-intensive operations. We do not classify water as a Tier 1 Material Topic and, therefore, do not publicly report on total water withdrawal and consumption at all Novolex manufacturing sites. Still, we are working to better understand our water use and identify initiatives for water-intensive facilities. For example, we have invested in improving the wastewater quality at our North Vernon, Ind., recycling center and overhauled the water processing system used for injection molding in our Chelmsford, Mass., facility. Our environmental operations team continues to look for water stewardship opportunities and production efficiencies across Novolex facilities.



For more than 25 years, the plastics industry has promoted Operation Clean Sweep (OCS), a campaign dedicated to helping every resin handling operation achieve zero plastic resin loss.

All Novolex sites that use resin pellets follow Operation Clean Sweep principles to monitor, manage and eliminate plastic pellet loss into the environment. In recognition of our commitment to these activities, in 2022 Novolex joined the Plastics Industry Association's program and advisory committee focused on implementation of Operation Clean Sweep Blue — an enhanced program that provides transparency and accountability via enhanced management, measurement, auditing and reporting.

Novolex will remain engaged in these efforts and seek to drive an even more consistent approach to resin handling across our facilities. While site auditing occurs regularly at Novolex, we want to be part of industry-wide efforts to standardize and scale enhanced training programs, regular audits and inspections through our participation in Operation Clean Sweep Blue.

FOOD AND PRODUCT SAFETY

TO MEET THE REQUIREMENTS OF OUR DIVERSE CUSTOMER BASE, our commitment to food and product safety starts at the highest levels of leadership and resonates throughout the organization. Our customers expect our products to meet stringent globally recognized standards required of all materials that come into contact with food. With a vision of safe food for consumers everywhere, 2,000 food industry leaders created the Global Food Safety Initiative (GFSI) to reduce food safety risks and build trust throughout the supply chain. GFSI drives continuous improvement in food safety management systems around the world. For more information about food and product safety at Novolex, see our [Food Safety webpage](#).

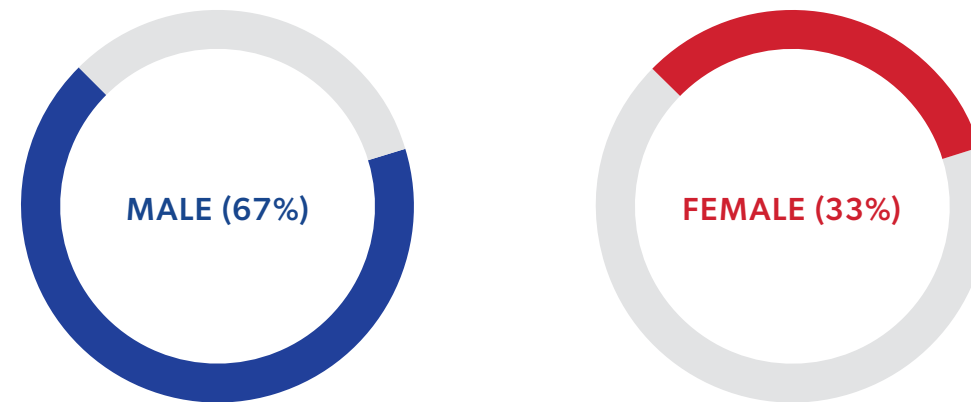


Novolex has **38 FACILITIES** certified to **GLOBAL FOOD SAFETY INITIATIVE (GFSI)** recognized standards.

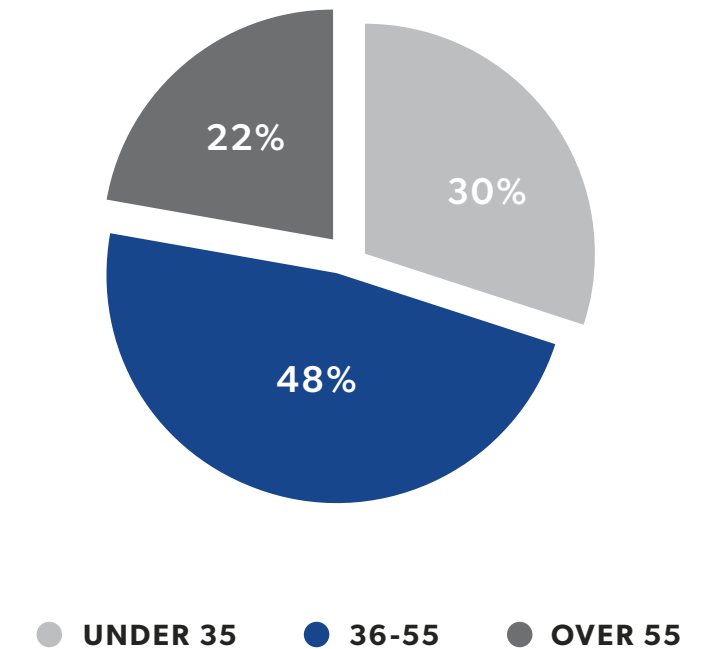
AT NOVOLEX, investing in our people and communities is central to our values. We are committed to fostering a workplace that prioritizes safety, ethical conduct, an inclusive culture, health and wellness, and support for our communities.

PEOPLE & COMMUNITIES

MALE / FEMALE EMPLOYEE COMPOSITION



EMPLOYEE AGE – DATA

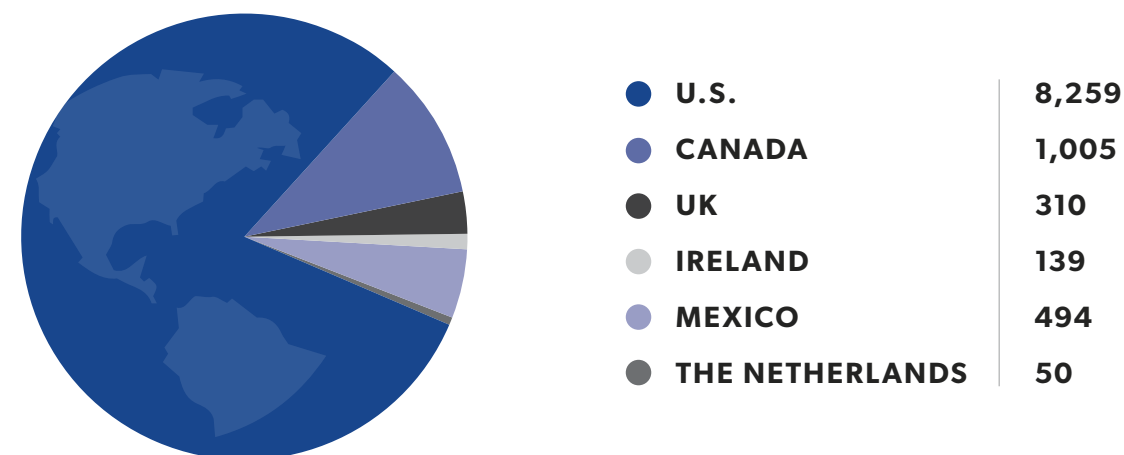


IN 2022, WOMEN OR PEOPLE OF COLOR MADE UP

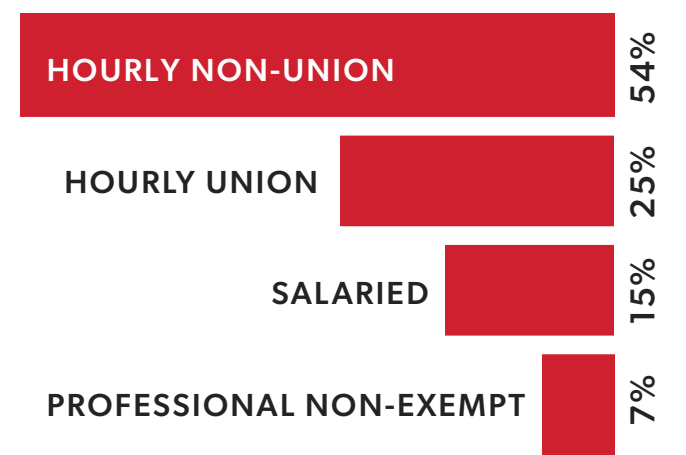


**US and Canada only*

TOTAL EMPLOYEE COUNT BY COUNTRY



EMPLOYEE CATEGORIES ALL NOVOLEX



SAFETY

SAFETY IS A CORE VALUE AT NOVOLEX, and we incorporate this value into everything we do every day. From the production floor of our manufacturing facilities to colleagues in an office, everyone deserves a safe working environment. Novolex has implemented industry-leading workplace safety policies and programs that reinforce existing safety procedures and seek new ways to constantly improve safety performance across the company. Novolex health and safety programs are supported by our Health and Safety Management System which tracks safety policies, processes, procedures, and performance. The system facilitates management of inspections, incident investigations, and both corrective and preventive action plans. The Novolex Board of Directors and the Sustainability and Environment, Health & Safety subcommittee of the Board also receive quarterly updates on safety performance and the progress of safety programs.

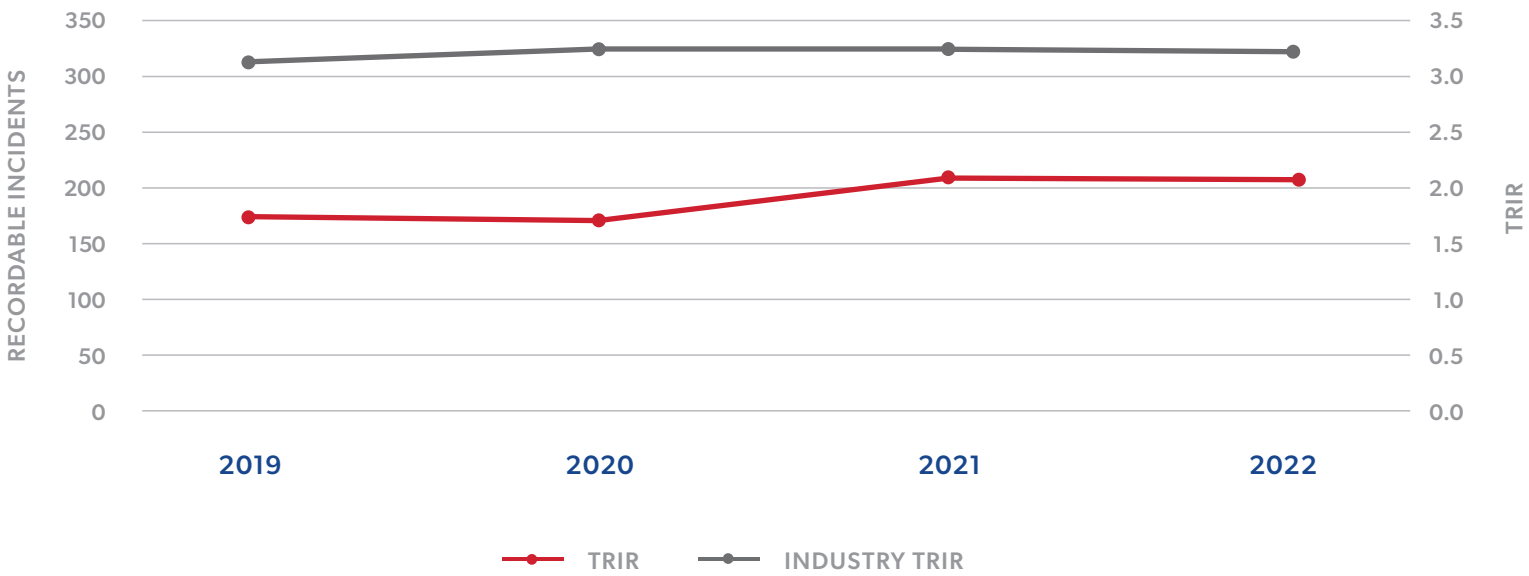


SAFETY PERFORMANCE

THE NOVOLEX TOTAL RECORDABLE INCIDENT RATE (TRIR) remains below the industry average, based on Occupational Safety and Health Administration (OSHA) guidelines and Bureau of Labor Statistics data. In 2022, we observed a slight decrease in safety incidents because of company-wide safety improvement measures and ended the year with a TRIR of 2.06 compared with a TRIR of 2.13 in 2021.



NOVOLEX TOTAL RECORDABLE INJURIES RATE (TRIR)
VS. INDUSTRY AVERAGE*



*U.S. Bureau of Labor Statistics

SAFETY CULTURE

SAFETY IS A CORE VALUE that is ingrained in everything we do from the way we operate our facilities to the way we design our products. Our safety culture is designed to ensure the well-being of our employees, contractors, customers, and communities. We have established teams and invested in processes to reduce risk and the potential for incidents to occur. More than 120 Novolex family members lead our health and safety programs, working alongside coworkers committed to achieving best-in-class environmental management programs, product quality initiatives, and food safety compliance. They work together to build a safety culture that is focused on constantly learning and communicating.

COMMUNICATING ABOUT SAFETY

Workers are encouraged to report work-related hazards during standing plant safety committee meetings, anonymously through suggestion boxes, and by using the Novolex Ethics Hotline. Safety committee meetings are conducted monthly and include both members of management and hourly employees. We empower employees to speak freely and give them a voice for change with our open-door policy without fear of reprisal to communicate safety matters one-on-one between workers and their supervisors. Employees are also able to report work-related hazards at safety committee meetings and receive periodic safety training, toolbox talks, assessments, and other communications to ensure a safe workplace.

Safety Programs and Initiatives

In 2022, a company-wide safety perception survey identified opportunities to further enhance our safety programs. In addition to activities at the plant level to address opportunities identified through the survey, Novolex has developed a steering team with members across divisions to drive company-wide initiatives to continue building a stronger safety culture. Among the changes was a decision to embrace the principles of *Human Performance* (HP) as a new way for Novolex to approach safety, and since then have started to apply the principles in other areas as well. HP is a holistic approach that includes understanding the way people, culture, equipment, processes, and systems interact, and how to put defenses in place to prevent incidents and injuries, reduce risk, and strengthen safety culture.

Novolex family members from every plant participated in various types of HP training, adding up to more than 7,500 hours of HP training across the organization in 2022.

“GOOD CATCH” PROGRAM

One outcome of our HP program was the launch in 2023 of the "Good Catch" program, which encourages employees to share near misses, suggest areas for improvement, and nominate colleagues for recognition when they observe fellow employees going the extra mile to make work safe and coach others.



Resources To Reduce Risk

At the heart of all Safety Programs is the reduction and elimination of risk, as well as providing the tools, training, and resources for employees to do their jobs safely. In addition to the HP training, employees participate in safety training through our Learning Management System, the use of “toolbox talks,” shift safety meetings, onboarding training for new hires, refresher courses, and other site-specific training. We also invested in front-line leadership training at 28 facilities, which included small group sessions, floor activities, and coaching for the participants about how to look at everyday activities through the lens of safety, risk identification, and risk mitigation. As well, plant leadership, along with the support of the workers on the floor, conduct GEMBA walks, audits, periodic risk assessments, and other means to identify and correct hazards in our production and shipping facilities.

PRINCIPLES OF HUMAN PERFORMANCE

- | | |
|---|---|
| 1 People are imperfect, and even the best make mistakes. | 4 Organizations and people drift. |
| 2 Error-likely situations are predictable. | 5 Events can be avoided by learning; how you respond to failure matters. |
| 3 Individual behaviors are influenced by culture and leadership. | 6 People achieve high levels of performance based on encouragement and reinforcement; blame fixes nothing. |

ETHICS, INTEGRITY AND HUMAN RIGHTS

NOVOLEX IS COMMITTED to maintaining the highest possible ethical standards for business conduct across the entire organization and within our supply chain. We document and communicate our expectations for ethical business conduct through our employee and supplier codes of conduct and our human rights policy as well as other policies and procedures that guide daily operations.

EMPLOYEE CODE OF CONDUCT

THE SEVEN PRINCIPLES of the [Novolex Employee Code of Conduct](#) provide clear expectations for employee behavior and are the foundation of the company's requirements for ethical business conduct. All Novolex employees must sign the code as part of the hiring process. The principles of the code are incorporated into Novolex employee handbooks, which are also introduced during new hire orientation. Additionally, the code and handbooks encourage employees to speak up if they believe they have witnessed a violation of the code. Employees can use the independent Novolex Ethics Helpline to confidentially report potential violations of the code. Novolex does not retaliate against employees who use the Helpline to report suspected violations.

▶

EMPLOYEE CODE OF CONDUCT PRINCIPLES

- 1 Obey the law**
- 2 Avoid conflicts of interest**
- 3 Keep accurate and honest records**
- 4 Honor business obligations**
- 5 Treat people with dignity and respect**
- 6 Protect company information, assets and interests**
- 7 Commit to be a responsible global citizen**

HUMAN RIGHTS

NOVOLEX HAS A ZERO-TOLERANCE POLICY regarding the use of illegal, forced, or involuntary labor, human trafficking, child labor or other unfair or discriminatory labor practices. [The Novolex Policy on Human Rights](#) explains our commitments and procedures to protect human rights, which align with globally recognized declarations and covenants including The International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. The code also recognizes the importance of human rights in our supply chains with particular reference to the U.K. Modern Slavery Act 2015, the California Transparency in Supply Chains Act and the U.S. Uyghur Forced Labor Protection Act, among others. The policy incorporates the views of our customers who want assurance that Novolex is committed to protecting human rights. We recognize that if not managed effectively, human rights issues could negatively impact our employees, contractors, suppliers, as well as customers and others.

RESPONSIBLE SUPPLY CHAINS

SUPPLY CHAIN PROVIDERS are important Novolex business partners and maintaining their understanding of and compliance with human rights as well as other ESG practices is essential. Our expectations of suppliers is embodied in the [Novolex Supplier Code of Conduct](#), which was updated in 2022 with additional provisions related to human rights and the environment, among other topics. All Novolex suppliers are required to acknowledge the code when they are engaged via the company's new Coupa supplier management platform. Launched in 2022, the platform requires suppliers to upload a range information including their human rights practices, carbon measurement capabilities and diversity status. Novolex contractual terms and conditions also include an obligation for suppliers to adhere to the code. If we suspect that suppliers are not adhering to the code, we will remedy the situation through the use of corrective actions, third-party audits, and other measures including contract termination if necessary. We extend access to the Novolex Ethics Helpline to employees of suppliers to provide them with a confidential way to report potential concerns they may encounter in their workplace.

To further support supplier understanding and adherence to the code, 67 Novolex Procurement staff were trained on the code when it was reissued, and new Procurement staff are required to complete the training online as part of their orientation program.

Supply Chain Diligence

To manage potential risks within our supply chain, we use the Intertek Inlight end-to-end Supplier Qualification Operating System to assess various risk factors among suppliers domiciled in high inherent risk countries. High inherent countries are determined based on country risk scores from the World Bank Governance Indicators, the U.N. Human Development Index, the Transparency International Corruption Index, and the U.S. State Department Trafficking in Persons Report. In 2022, suppliers domiciled in high-risk countries completed the Intertek *Self-Assessment Questionnaire* covering their human rights and other ESG practices. Suppliers that score poorly are required to prepare and complete a corrective action plan.



HUMAN CAPITAL

WITH A GLOBAL WORKFORCE EXCEEDING 10,000 dedicated members of the Novolex family, our success depends on the empowerment and well-being of our employees—the foundation of the organization, driving our business forward. We remain steadfast in our commitment to offer our employees avenues for professional growth, ensuring they feel valued and supported in an inclusive work environment. The collective knowledge and diverse perspectives within the Novolex family position us for long-term success, enabling us to adapt and thrive in the years to come.



DEVELOPING TALENT

- ◆ In 2022, we filled 40% of open salaries positions* with internal promotions, 60% of which were by individuals who identify as women, BIPOC (Black, Indigenous and People of Color), or other marginalized identities.
- ◆ We support our employees through their career journeys by providing detailed performance feedback. In 2022, 83% of eligible employees** completed performance reviews.

*U.S. only | **U.S. and Canada

TALENT DEVELOPMENT

At Novolex, we understand that investing in our employees' development is essential to fostering a winning, entrepreneurial mindset and is crucial to building a rewarding career. We support the growth and development of our employees by providing on-the-job developmental assignments, e-learning courses and best-in-class in-person training programs through Novolex University. Annual performance evaluations and talent reviews combine with continuous feedback through one-on-one sessions to nurture our talent to prepare them for increased roles and responsibilities.

As part of our investment in our employees, we encourage all members of the organization to contribute to and continue learning how to support a sustainable future. To facilitate this, we employ various communication platforms. The entire Novolex sales force completed a five-module training program covering multiple emerging topics related to product design, composting and recycling claims, product carbon footprint (PCF) analysis, and raw material sustainability. A Novolex internal publication, *Green 411: Environmental Stewardship through Knowledge and Positive Action*, serves as a valuable resource featuring sustainability news, product updates and practical tips on how to live a more sustainable lifestyle. We have also introduced a video podcast series for employees called *Voices of Novolex* in which we spotlight employees discussing a range of business-critical topics such as products and materials that promote the circular economy, innovations in packaging, and safety initiatives.

Through these educational platforms, we not only keep Novolex employees informed about ongoing efforts to reduce Novolex's environmental footprint but also inspire them to incorporate these learnings into both their professional and personal lives. Novolex works with employees to help them champion sustainability through various opportunities, including:

- ◆ Creating new products by using technology capabilities within the company
- ◆ Pushing forward waste management strategies within Novolex facilities
- ◆ Identifying and developing process efficiencies throughout Novolex operations
- ◆ Contributing to local communities as environmental stewards

DIVERSITY, EQUITY AND INCLUSION

DIVERSITY, EQUITY AND INCLUSION (DE&I) IS FUNDAMENTAL to who we are as a company. In 2022, we finalized our DE&I strategy with the support of an external consulting firm specializing in DE&I, Exponential Talent. Novolex disclosed in last year's sustainability report that the firm facilitated a culture assessment that included more than 15 one-on-one interviews with senior management, and 20 randomly selected focus groups at all levels of the organization to determine the state of inclusion and belonging within Novolex. Based on the results of the assessment, Novolex created five pillars that would drive DE&I strategy with annual objectives and guidance for our overall business. Created with the intention to embed DE&I in all parts of our business and culture, the pillars will guide us in the creation of a workforce that is representative of the communities in which we operate, a workplace where there are equitable opportunities to learn and grow, as well as creating a culture where all feel included regardless of identity or background.



NOVOLEX DIVERSITY, EQUITY & INCLUSION PILLARS



LEADERSHIP COMMITMENT & ACCOUNTABILITY

In order to ensure that we continue to grow in our DE&I journey, we are developing a DE&I Council that will come together to drive DE&I programming, strategy and goals moving forward. The DE&I Council will be made up of top leaders from across the company. Additionally, leaders across the company will also begin to develop DE&I focused goals for their teams.



RECRUITMENT

In order to attract the best diverse talent to Novolex, we are working to implement DE&I best practices in our recruiting processes. This includes training recruiters on how to remove bias from job descriptions as well as training recruiters and hiring managers on how to make less biased hiring decisions. We will also examine our processes to better track candidates and work to develop a strong external employer brand to enhance our ability to attract great candidates.



GROWTH & DEVELOPMENT

In order to advance efforts that increase the retention and advancement opportunities for the diverse talent within the company, we are developing training programs to help emphasize the benefits of and opportunities for internal promotion. We are also ensuring that DE&I best practices are embedded in our Talent Review and Development processes.



INCLUSIVE CULTURE

In order to foster a culture where our people feel respected, accepted and supported, we will work closely with the DE&I Council to develop consistent programming that recognizes cultural identities and their unique contributions to the Novolex community. We will also listen to our Novolex Family and gather input on additional programs and support systems to help make everyone feel a sense of belonging.



SUPPLIER DIVERSITY

In order to develop and build supplier partnerships that reflect greater diversity, our Procurement team has already begun work to understand who our diverse suppliers are. The new Coupa platform is pivotal in this venture and the Procurement team will continue to work hand in hand with our DE&I leaders to ensure that we're all moving forward with the same goals.

DE&I Council

A component of the Leadership Commitment & Accountability pillar of our DE&I strategy included the creation of the Novolex DE&I Council, composed of a diverse cross section of company leaders. The Council provides governance, guidance, and support to ensure programs and activities support the Novolex Diversity, Equity & Inclusion strategies and objectives. DE&I Council members contribute their perspectives regarding the DE&I initiatives, both amplifying effective actions across operations and identifying barriers. In addition, Council members share DE&I best practices from their areas of the organization, as well as share ideas from other Council members to their organizations and across Novolex operations. The Novolex Chairman and CEO, Chief Human Resource Officer and Employee Experience Senior Director serve as the DE&I Council sponsors.



Novolex booth at the National Black MBA Association's Recruitment Fair



Inclusive Culture

Our DE&I Council works with additional cross-functional, international teams to develop ways to foster an inclusive culture throughout the organization. Cultural recognition toolkits include educational materials, video meeting backgrounds, posters, book clubs and inclusion panels, providing opportunities to educate about different cultures and perspectives and contributing to the ongoing development of our inclusive and welcoming community.

Recruitment

In order to attract the best diverse talent to Novolex, we are implementing DE&I best practices in our recruiting processes. Novolex recruiters attended the National Black MBA Association's Job Recruitment Fair where we were able to connect with multiple prospective applicants that we previously would not have been able to reach. We also participate in veterans job fairs, allowing Novolex to meet with those who served our country in hopes of hiring them for full-time employment.

EMPLOYEE HEALTH AND WELLNESS

NOVOLEX PROVIDES A VARIETY OF BENEFITS and other resources for all members of the Novolex family to foster our goal to provide a work environment that supports employee and family wellbeing.

In 2022, Novolex collected feedback to increase employee input on health and well-being using surveys, employee listening sessions, and utilizing our network of more than 100 frontline Human Resources professionals who interact with employees daily. The goal was to identify how we could better communicate the Novolex benefits program value proposition, improve employee understanding of company health and welfare programs, and encourage employees to take steps to maintain or improve their good health.

The research resulted in new communications strategies. The use of infographics, posters with QR codes, and digital displays were expanded throughout plants and offices to provide employees with easily accessible information about the various programs and benefits available to them. Other forms of communication, such as the MyChoice mobile app, were highlighted to promote access to the benefits portal. Mobile access enhances an employee’s benefits experience in a quick and efficient way—providing the information they need all in the palm of their hands. Using apps to deliver benefits content also saves trees and costs by reducing hardcopy materials mailed to homes.

In 2022, Novolex introduced a new program—GIThrive—a gastrointestinal (GI) health management program in response to GI-related disorders being the second highest driver of claims in the Novolex-sponsored medical plan and a cause for time off from work. With GIThrive, eligible employees and their spouses have access to a GutCheck microbiome analysis, registered Dietitian and Health Coach, on-demand courses and expert articles, and a personalized action plan to help improve their digestive health.



NOVOLEX CHAIRMAN'S SCHOLARSHIP

In its inaugural year, five children of Novolex U.S. employees received four-year scholarships to post-secondary schools of their choice. Applications submitted annually by employee children are reviewed by a panel of employees who select the winners.



NOVOLEX BROAD-BASED EMPLOYEE AWARD PLAN

In 2022, Novolex introduced a new award plan for employees to recognize their contributions to the growth of the company. The Novolex Broad-based Employee Award Plan provides eligible employees with an opportunity to participate in the growth and success of Novolex, offering a cash award to eligible employees based on an increase in the valuation of the company. The benefit is available to everyone after one year of service—from employees in upper management to the production floor, salaried and hourly, and union and non-union, and requires no employee contribution to participate.



COMMUNITIES AND FOCUSED GIVING

NOVOLEX SUPPORTS THE COMMUNITIES WHERE WE OPERATE, seeking opportunities to give back through both donations and volunteer work. The Novolex Focused Giving Program directs our support towards organizations that align with our businesses, products and values. Accordingly, our support focuses on food and hunger needs, sustainability, and health and wellness. We incorporate employee feedback to determine which projects to consider and prioritize. In addition to implementing various initiatives for community support, we donate Novolex products, such as utensils, plates, cups and bags, to local non-profit organizations facing challenges. By donating Novolex products, we can contribute to meeting immediate community needs and make a positive impact on lives.



Employee Activity Challenge

Novolex continued support for the Red Cross in 2022 through the September Activity Challenge which encouraged employees to contribute to reaching 10,000 hours of total exercise. Employees participated by documenting their individual activities, such as walking, running, hiking, and even dancing to help raise money for the Red Cross.

**In 2022, NOVOLEX
SPONSORED over
25 GIVING EVENTS
across Novolex facility
locations and communities**



No Hunger Holidays

In November, Novolex initiated the No Hunger Holidays campaign with a donation to Feed the Children, a leading hunger relief organization with which Novolex has a long-standing relationship. We also provided communication to employees on how they can get involved with this initiative by inviting them to make additional monetary and product donations, providing links that employees could use to write notes to families receiving boxes from Feed the Children during the holidays to help make the donations special and personal, and sharing various resources to help employees connect with and support food banks in their communities.



Arbor Day Foundation's Community Canopy Program

In celebration of Earth Day and Arbor Day, Novolex donated to the Arbor Day Foundation's Community Canopy program. In return for support the Arbor Day Foundation provided Novolex with 250 trees for employees to grow in their communities. The Arbor Day Foundation provides an online tool to help participating Novolex employees determine the ideal location to plant trees for maximum savings on their energy bills and track the growth of the tree. For employees who live in a community that is unable to receive trees through the mail, Arbor Day will plant a tree in that employee's vicinity on their behalf, removing obstacles for our employees to participate in this event.



APPENDIX

MATERIALITY ASSESSMENT

IN 2020, NOVOLEX ENGAGED a leading sustainability consultancy firm to conduct a materiality assessment. We identified and prioritized topics most important to the business and our stakeholders, resulting in 23 topics, including nine high-priority, Tier 1 topics. Our Tier 1 topics influenced the disclosures addressed in this report and in our Global Reporting Index (GRI) and Sustainability Accounting Standards Board (SASB) content index on the following pages.

The content indexes below provide Novolex disclosures relevant to the GRI Standards and the SASB frameworks unless otherwise noted. Novolex reports in accordance with the 2021 GRI Universal Standards and in alignment with SASB's Containers & Packaging Industry Standards.

TIER 1 MATERIALITY TOPICS

- 1** Circular Economy
- 2** Product Design and Innovation
- 3** Public Policy
- 4** Materials
- 5** Emissions
- 6** Waste Management
- 7** Consumer Education
- 8** Occupational Health and Safety
- 9** Diversity and Equal Opportunity



GRI INDEX

DISCLOSURE	LOCATION/RESPONSE	OMISSION		
		Requirement(s) Omitted	Reason	Explanation
The organization and its reporting practices				
2-1 Organizational Details	a. Sustainability Vision, Pillars and Metrics, p. 5 b. Governance, p. 7 c. Hartsville, South Carolina d. Novolex maintains operations in the U.S., Canada, Mexico, the U.K., Ireland, and the Netherlands.			
2-2 Entities included in the organization’s sustainability reporting	a. The reporting entity, Novolex Holdings, LLC (“Novolex”), is majority owned and controlled by affiliates of Apollo Global Management through a holding company structure in which the Board Directors of our ultimate parent company is our highest governance body. The reporting covers the activities of Novolex Holdings, LLC and its subsidiaries. See also, Governance, p.7	b., c. (i, ii, iii)	b. Not applicable c. Not applicable	b. Novolex is privately held and financial information is not a matter of public record. c. Novolex Holdings LLC is the consolidating entity.
2-3 Reporting period, frequency, and contact point	a. The reporting period is January-December 2022; Novolex publishes a sustainability report annually. b. The finacial reporting period is January-December 2022; the sustainabiity report is not required to align with the date of the company's financial report which is not public. c. This report was published in July 2023 and covers activities that principally occured in 2022. d. Novolex Approach to Sustainability, p. 4			
2-4 Restatements of information	a. Novolex is restating 2021 emissions due to newly published emissions factors.			

The organization and its reporting practices

2-5 External Assurance	<p>a. The company's sustainability-linked financing requires third-party assurance of annual greenhouse gas (GHG) emissions data which are reviewed by Novolex senior management. The sustainability report is not assured by a third party.</p> <p>b. (i) The Report of Independant Accountants provides assurance of GHG emissions data.</p> <p>(ii) The scope of the assurance covers greenhouse gas (GHG) emissions, total energy consumption, and emissions intensity. The assurance was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) in AT-C section 105, Concepts Common to All Attestation Engagements, and AT-C section 210, Review Engagements. The assurance relies on information provided by Novolex and considers the principles and guidance of the World Resources Institute (WRI) and the World Business Council for Sustainable Development's (WBCSD), The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition and the GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard (together, the "GHG Protocol") to guide the criteria to assess, calculate, and report total Scope 1 and 2 emissions, total energy consumption as well as emissions intensity.</p> <p>(iii) Independant assurance was provided by Pricewaterhouse Coopers LLC (PWC) which was retained by the company to provide the assurance. Link.</p>			
2-6 Activities, value chain, and other business relationships	<p>a. Novolex Company Overview Webpage</p> <p>b. Novolex Company Overview Webpage; Sustainability Vision, Pillars and Metrics, p. 5</p> <p>c. Policies and Partnerships, How We Engage, p. 16</p> <p>d. No significant changes in a, b, and c. compared to the previous reporting period.</p>			
2-7 Employees	<p>a. People and Communities, p. 22</p> <p>b. People and Communities, p. 22</p> <p>c. (i) The methodology used to compile the data is head-count.</p> <p>(ii) The head-count data reflects permanent employees at the end of the reporting period.</p> <p>d. Contextual information is not required.</p> <p>e. There are no significant fluctuations in the number of employees during the reporting period.</p>			

<i>The organization and its reporting practices</i>				
2-8 Workers who are not employees	a. (i) 600 contractors (temporary workers) were retained during the reporting period. (ii) Contractors were retained via local employment agencies. (iii) Contractors were principally engaged packaging products at company production facilities. b. Numbers are in FTE (40 hrs./wk.); some may convert, others are seasonal, and none are on benefits. c. Numbers may fluctuate due to seasonality.			
<i>Governance</i>				
2-9 Governance structure and composition	a. The reporting entity, Novolex Holdings, LLC (“Novolex”), is majority owned and controlled by affiliates of Apollo Global Management through a holding company structure in which the Board Directors of our ultimate parent company is our highest governance body. See also, Governance, p.7. b. Governance, p. 7 c. Governance, p. 7; The Board includes one independent member who is female.	c. (vi)	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-10 Nomination and selection of the highest governance body	a. The members of the Board were nominated by the principal shareholders. The members of the committees of the Board were selected by the Board. b. The criteria for nominating and selecting the members of the Board took into consideration: (i) the views of stakeholders (including shareholders); (ii) diversity; (iii) independence; and (iv) competencies relevant to the impacts of the organization.			
2-11 Chair of the highest governance body	a. Governance, p. 7 b. The Chair of the Board is also the Chief Executive Officer and responsible for oversight of daily operations. He brings to both roles extensive experience in packaging. Any potential conflicts of interest are mitigated through oversight provided by other members of the Board.			
2-12 Role of the highest governance body in overseeing the management of impacts	a. Governance, p. 7 b. Governance, p. 7 c. Governance, p. 7			

Governance

2-13 Delegation of Responsibility for managing impacts	a. Governance, p. 7 b. Governance, p. 7			
2-14 Role of the highest governance body in sustainability reporting	a. The S&EHS Committee of the Board reviews and is given an opportunity to provide feedback to the Senior Leadership Team prior to publication of the report.	b.	Not applicable	Novolex S&EHS Board Committee reviews the company's annual sustainability report prior to publication.
2-15 Conflicts of interest		a., b.	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-16 Communication of critical concerns	a. Critical concerns can be communicated by the Senior Leadership Team during quarterly meetings of the Board or Audit Committee or at other times as needed if matters of concern arise.	b.	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-17 Collective knowledge of the highest governance body	a. Governance, p. 7			
2-18 Evaluation of the performance of the highest governance body			Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-19 Remuneration policies	b. Selected senior executives are evaluated annually on their performance against goals which include impacts on the economy, environment, and people. Governance, p. 7	a. (i, ii, iii)	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-20 Process to determine remuneration		a., b.	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.
2-21 Annual total compensation ratio		a., b., c.	Confidentiality constraints	Novolex is privately held and this information is not a matter of public record.

<i>Strategy, policies and practices</i>				
2-22 Statement on sustainable development strategy	a. CEO Message, p. 3; Novolex Vision, Pillars and Metrics, p. 5			
2-23 Policy Commitments	a. (i) Ethics, Integrity and Human Rights, p. 25, Novolex Human Rights Policy, Novolex Statement on Modern Slavery, Novolex Supplier Code of Conduct (ii) Novolex Employee Code of Conduct (iii) Novolex Employee Code of Conduct (iv) Novolex Employee Code of Conduct; Novolex Human Rights Policy b. (i) Ethics, Integrity and Human Rights, p. 25; Novolex Human Rights Policy (ii) Novolex Human Rights Policy c. Novolex Human Rights Policy (website) d. CEO and Chairman, the senior-most position in the company. e. Ethics, Integrity and Human Rights, p. 25; Novolex Employee Code of Conduct; Novolex Human Rights Policy; Supplier Code of Conduct f. Ethics, Integrity and Human Rights, p. 25; Novolex Employee Code of Conduct; Novolex Human Rights Policy; Supplier Code of Conduct; Contratural Terms and Conditions			
2-24 Embedding policy commitments	a. Novolex Employee Code of Conduct; Ethics, Integrity and Human Rights, p. 25			
2-25 Processes to remediate negative impacts	a. Novolex Employee Code of Conduct b. Novolex Employee Code of Conduct; Ethics, Integrity and Human Rights, p. 25 c. Supplier Code of Conduct; Ethics, Integrity and Human Rights, p. 25; Responsible Supply Chains, p. 25 d. Employees are informed of grievance procedures and the Novolex Employee Ethics Hotline during onboarding and on-going via communications and posters to reinforce grievance procedures. e. Employees can report grievances to their direct supervisors and to their Human Resources representatives. Both Novolex and supplier employees have access to the Novolex Ethics. Hotline to report potential violations of the Novolex Code of Conduct or the Novolex Supplier Code of Conduct, respectively, confidentially and without fear of retaliation.			
2-26 Mechanisms for seeking advice and raising concerns	a. Ethics, Integrity and Human Rights, p. 25-26; Novolex Employee Code of Conduct; Ethics & Compliance Hotline.			

<i>Strategy, policies and practices</i>				
2-27 Compliance with laws and regulations		a., b., c., d.	Confidentiality constraints	Novolex does not publicly disclose this information. The Novolex Employee Code of Conduct stipulates adherence to all local laws and regulations. In instances where OSHA or environmental regulations have not been followed, that information is typically available publicly. We track and work to remedy any areas of non-compliance in our organization.
2-28 Membership associations	a. Policy and Partnerships, p. 16			
<i>Stakeholder engagement</i>				
2-29 Approach to stakeholder engagement	a. Policy and Partnerships, p. 16			
2-30 Collective bargaining agreements	a. 25% are hourly union workers (Novolex Family Members by the Numbers; p.22) b. Working conditions in plants without collective agreements are identical to those in facilities with collective agreements.			
<i>Material Topics</i>				
3-1 Process to determine material topics	a. Novolex Approach to Sustainability, p. 4; Materiality Assessment, p. 31 b. Novolex Approach to Sustainability, p. 4; Materiality Assessment, p. 31			
3-2 List of material topics	a. Novolex Approach to Sustainability, p. 4; Materiality Assessment, p. 31 b. There are no changes in the material topics identified in our initial assessment.			

TOPIC-SPECIFIC DISCLOSURES

Materials

3-3 Management of material topics	a. Actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights are covered throughout the report. b. The manner in which the organization is involved with negative impacts through activities or as a result of business relationships, and the activities or business relationships, are covered throughout the report. Business relationships are covered in Policies and Partnerships, p. 16 c. Novolex Approach to Sustainability, p. 4; Sustainability Vision, Pillars and Metrics; p. 5, Products, p. 8-9; Operations p. 17-21 d. Novolex Approach to Sustainability, p. 4; Products, p. 8 -16; Operations, p. 17-21 e. Novolex Approach to Sustainability, p. 4; Products, p. 8-16; Operations, p. 17-21 f. Novolex Approach to Sustainability, p. 4; Products, p. 8-16; Operations, p. 17-21			
301-1 Materials used by weight or volume	a. Products, p. 8-9 Additional recommendations: Products, p. 8-9			
301-2 Recycled input materials used	a. Products, p. 8-9			
301-3 Reclaimed products and their packaging materials		a., b.	Information unavailable	Reclamation data for specific product types is not widely available.

Emissions

3-3 Management of material topics	1.1 a. Greenhouse Gas Reduction Target, p. 17; Energy and Emissions, p. 18 b. We recognize that reliance on virgin fiber and raw materials derived from fossil fuels and other sources have consequences for the environment. Our report acknowledges that these areas require ongoing focus. c. Greenhouse Gas Reduction Target, p. 17; Energy and Emissions, p. 18 d. Greenhouse Gas Reduction Target, p. 17; Energy and Emissions, p. 18 e. Greenhouse Gas Reduction Target, p. 17; Energy and Emissions, p. 18 f. Greenhouse Gas Reduction Target, p. 17 1.2 a. Novolex does not use carbon offsets.			
-----------------------------------	--	--	--	--

Emissions

305-1 Direct (Scope 1) GHG emissions	<p>a. 29,234 (Metric Tons CO₂e)</p> <p>b. CO₂, CH₄, N₂O</p> <p>c. 0 (Metric Tons CO₂e)</p> <p>d. 2019</p> <p>(i) Greenhouse Gas Reduction Target, p. 17</p> <p>(ii) Greenhouse Gas Reduction Target, p. 17</p> <p>Base Year Scope 1 Emissions: 30,246 (Metric Tons CO₂e)</p> <p>Base Year Intensity Metric: 0.275 (Scope 1 + Scope 2 Market-Based Metric Tons CO₂e Emissions per Metric Ton Production).</p> <p>(iii) Novolex has not had any recalculations of Scope 1 GHG emissions.</p> <p>e. Fuels associated with Scope 1 emissions were matched to their respective emission factors from the EPA GHG Emission Factors Hub 2022. Global Warming Potentials were pulled from IPCC's 2007 fourth assessment (AR4).</p> <p>f. Operational control</p> <p>g. Emissions were calculated in alignment with the GHG Protocol: A Corporate Accounting and Reporting Standard.</p> <p>Minor emission sources (diesel, propane, motor gasoline, and acetylene, refrigerants) were proven immaterial and excluded from Novolex's FY22 inventory.</p> <p>North American natural gas data was provided through a third party, ISG, who compiled a comprehensive report that included natural gas consumption broken down by month. International facilities provided invoices directly to Novolex. In instances where natural gas use for an individual month was missing, estimates were made based on reported data to ensure completeness.</p>			
--------------------------------------	---	--	--	--

Emissions

305-2 Energy indirect (Scope 2) GHG emissions	<p>a. 245,517 (Metric Tons CO2e)</p> <p>b. 276,168 (Metric Tons CO2e)</p> <p>c. CO2, CH4, and N2O</p> <p>d. 2019</p> <p>(i) Greenhouse Gas Reduction Target, p. 17</p> <p>(ii) Greenhouse Gas Reduction Target, p. 17</p> <p>Base Year Scope 2 MB Emissions: 324,611 (Metric Tons CO2e)</p> <p>Base Year Intensity Metric: 0.275 (Scope 1 + Scope 2 Market-Based Metric Tons CO2e Emissions per Metric Ton Production).</p> <p>(iii) Novolex has not had any recalculations of Scope 2 GHG emissions.</p> <p>e. EPA eGRID 2021 (released 2023), IEA 2022 Emission Factor Database, and Part 3 of the 2022 NIR are used to apply regional emission factors to facilities in the United States, international countries, and Canada respectively. EIA 2018 energy intensity factors are used when estimating usage. Market-based methods also used AIB 2021 Residual Mix data for EMEA and the Edison Electric Institute's Electric Company Carbon Emissions and Electricity Mix Reporting Database for Corporate Customers (June 2022). Global Warming Potentials were pulled from IPCC's 2007 fourth assessment (AR4).</p> <p>f. Operational Control.</p> <p>g. North American electricity data was provided through a third party, ISG, who compiled a comprehensive report that included natural gas consumption broken down by month. International facilities provided invoices directly to Novolex. In instances where electricity use for an individual month was missing, estimates were made based on reported data to ensure completeness. Additionally, 18 facilities (20 addresses) under Novolex's operational control did not provide any primary energy data. ERM estimated their GHG footprints using square footage and building-specific energy intensity factors. These locations were assumed to have emissions from both electricity and purchased heating originating with the consumption of natural gas. Electricity was estimated using square footage of occupied space and EEIO electricity intensity factors. Purchased heating was estimated using square footage of occupied space and EEIO natural gas intensity factors.</p>			
---	---	--	--	--

Emissions

305-3 Other indirect (Scope 3) GHG emissions		a., b., c., d., e.(i,ii,iii), f., g.	Information unavailable	Data is currently unavailable, but Novolex is developing Scope 3 calculation processes for the next reporting year.
305-4 GHG emissions intensity	a. 0.233 (Scope 1 + Scope 2 Market-Based Metric Tons CO2e Emissions per Metric Ton Production) b. Metric Tons Production c. Scope 1 and Scope 2 Market-Based Emissions d. CO2, CH4, and N2O Energy and Emissions, p. 18			
305-5 Reduction of GHG emissions	a. Operations, p. 17 b. CO ₂ , CH ₄ , N ₂ O c. Operations, p. 17 d. Operations, p. 17 e. Our data is assured by a third party: Report of Independent Accountant: https://novolex.com/wp-content/uploads/Clydesdale-Acquisitions-PwC-Report-of-Independent-Accountant_Web.pdf			
305-6 Emissions of ozone-depleting substances (ODS)		a., b., c., d.	Information Unavailable	Novolex does not report this information.
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	a. (i.) Air Emissions, p. 19 (ii.) Air Emissions, p. 19 (iv.) Air Emissions, p. 19 (vi.) Air Emissions, p. 19 b. Novolex uses the EPA emission factor AP-42: Compilation of Air Pollutant Factors. c. Novolex takes its actual natural gas consumption and applies the EPA emission factor AP-42 to calculate its air emissions by facility.	a.(iii.), a.v., a.(vii.)	Information Unavailable	Novolex does not report this information.

<i>Waste Management</i>				
3-3 Management of material topics	a. Products, p. 8-9; Air, Waste and Water, p. 19-20 b. Products, p. 8-9; Air, Waste and Water, p. 19-20 c. Products, p. 8-9; Air, Waste and Water, p. 19-20 d. Products, p. 8-9; Air, Waste and Water, p. 19-20 (ii.) Negative impacts can occur along the company's supply chain. GHG emissions result from waste, while we are still working to quantify emissions from waste, we are taking steps to measure and manage waste-to-landfill. e. Products, p. 8-9; Air, Waste and Water, p. 19-20 f. Products, p. 8-9; Air, Waste and Water, p. 19-20			
306-1 Waste generation and significant waste-related impacts	a. Products, p. 8-9; Air, Waste and Water, p. 19-20			
306-2 Management of significant waste-related impacts	a. Products, p. 8-9; Air, Waste and Water, p. 19-20 b. Products, p. 8-9; Air, Waste and Water, p. 19-20 c. Products, p. 8-9; Air, Waste and Water, p. 19-20			
306-3 Waste generated	a. Products, p. 8-9; Air, Waste and Water, p. 19-20 b. Products, p. 8-9; Air, Waste and Water, p. 19-20	b. partial gap	Information Unavailable	Novolex does not currently report the breakdown of this information for hazardous waste.
306-4 Waste diverted to disposal	a. Products, p. 8-9; Air, Waste and Water, p. 19-20 Total: 54,899.15 metric tons Recycled: 54,810.89 metric tons Composted: 44.54 metric tons Digested: 43.72 metric tons c. Non-Hazardous Waste, p. 20 e. Novolex used a excel based data collection method, working with waste-hauler partners to identify pounds of waste generated onsite broken down by facility, type (i.e., plastic, paper, etc.) and treatment (i.e., recycled, landfilled, etc.). A master facility list provided by Novolex was used as a reference to track which facilities we had received data for. At the end of the process, estimations were made for landfilled waste for US and Mexico facilities that did not already report this quantity. The estimations were based on the square footage and reported landfilled waste of the US facilities that did report their landfilled waste. Canadian sites are not yet included in this reporting.	b., d. (i, ii.), e.	Information Unavailable	Novolex does not report this information.

<i>Waste Management</i>				
306-5 Waste directed to disposal	a. Total: 12,319.83 metric tons Landfill: 12,014.83 metric tons Combusted: 305 metric tons c. (iii) Non Hazardous Waste, p. 20 (iv) Non Hazardous Waste, p. 20 e. Content Index (306-4)	b.(i.ii.,iii.iv), c.(i, ii.), d.(i, ii), e.	Information Unavailable	Novolex does not report this information.
<i>Occupational Health and Safety</i>				
3-3 Management of material topics	Safety, p. 23-34; Employee Health and Wellness, p. 29			
403-1 Occupational health and safety management system	a. Safety, p. 23-24; the Novolex Health and Safety Management System is fit for purpose and aligned with industry best practices that can exceed legal and regulatory requirements or recognized industry standards or guidelines. The latter include regulations promulgated by the US Occupational Safety and Health Administration and industry standards published by the National Institute of Occupational Health and Safety, the American National Standards Institute, the US National Fire Protection Association and analogous regulations and standards in other countries in which we operate. b. All locations and workers (salaried, hourly, and temporary employees) are covered by an occupational health and safety management system.			
403-2 Hazard identification, risk assessment, and incident investigation	a. (i.) Plants are supported by ten dedicated corporate Health & Safety positions that are complemented by plant leadership, facility health and safety leaders, and production supervisors who assist, support, and review the identification and abatement of workplace hazards. Additionally, 3rd party consultants to conduct safety assessments including companies being considered for acquisition. (ii.) Safety, p. 23-24 b. Safety, p. 23-24 c. Safety, p. 23-24 d. Safety, p. 23-24			

Occupational Health and Safety

403-3 Occupational health services	<p>a. Safety, p. 23-24; In addition, audiometric testing is conducted annually as required in locations covered by our Hearing Conservation Program which includes the use of hearing protection PPE. Testing is conducted by a third party to ensure compliance. Noise surveys are also conducted in the course of assessing a facility for acquisition. Other industrial hygiene testing is conducted when needed.</p> <p>1.3.1. Medical records are kept confidential through the inclusion of Human Resources in all Workers Compensation Claims Management. Names or other identifying information, including medical records, are not shared in communications regarding incidents with the exception of disclosures in compliance with HIPAA regulations.</p> <p>1.3.2. Health-related information is not used to influence treatment of workers and would only be used in the event that an employee would not be able to safely conduct a job or task based on fitness for duty and/or safety concerns, in which case employees would be involved in a confidential ADAA assessment.</p>			
403-4 Worker participation, consultation, and communication on occupational health and safety	<p>a. Safety, p. 23-24</p> <p>b. Safety, p. 23-24; Union agreements at all sites include provisions in collective bargaining agreements pertaining to safety. Regardless of union status, all Novolex sites treat safety matters in the same manner. Safety topics are included in all company handbooks and collective bargaining agreements</p>			
403-5 Worker training on occupational health and safety	<p>a. Safety, p. 23-24; Ethics, Integrity and Human Rights p. 25; Novolex Supplier Code of Conduct</p>			
403-6 Promotion of worker health	<p>a. Employee Health and Wellness, p. 29</p> <p>b. Employee Health and Wellness, p. 29</p>			
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<p>a. Safety, p. 23-24;</p>			

<i>Occupational Health and Safety</i>				
403-8 Workers covered by an occupational health and safety management system	a. Safety, p. 23-24; the Novolex Health and Safety Management System is fit for purpose and aligned with industry best practices that can exceed regulatory requirements or recognized industry standards or guidelines. (i) The management system covers 100% of employees and workers; People & Communities p. 22; In addition to employees, 600 workers who were not employees were employed during the reporting year. (ii) All employees and workers are covered by an internally audited Management system; the number of contractors is not available. b. No workers are excluded from the management system.	a.(ii); c.	a(iii) Information unavailable c. Not applicable	Novolex does not track this information at this level. No contextual information is required
403-9 Work-related injuries	d. Safety, p. 23-24 e. 200,000 hours worked	a.(i,ii,iii,iv,v.), b.(i, ii.,iii,iv,v), c.i,ii,iii), f., g.	Confidentiality constraints	Novolex does not publicly report this information.
403-10 Work-related ill health	a. (ii) Safety, p. 23	a.(i.iii), b.(i,ii,iii), c.(i,ii,iii.), d., e.	Confidentiality constraints	Novolex does not publicly report publicly this information.

Diversity and Equal Opportunity

3-3 Management of material topics	a. Diversity, Equity and Inclusion, p. 27-28 b. Diversity, Equity and Inclusion, p. 27-28 c. Diversity, Equity and Inclusion, p. 27-28 d. Diversity, Equity and Inclusion, p. 27-28 e. Diversity, Equity and Inclusion, p. 27-28 f. Diversity, Equity and Inclusion, p. 27-28			
405-1 Diversity of governance bodies and employees	a. (i.) Board by Gender: 87.5% Male, 12.5% Female; Senior Leadership Team by Gender: 78% Male, 22% Female (iii.) Board by Race & Ethnicity: White: 100%, BIPOC: 0%	a.(ii)., b.(i,ii,.iii).	Information unavailable	Novolex does not track this information at this level.
405-2 Ratio of basic salary and remuneration of women to men		a., b.	Information Unavailable	Novolex does not report this information.

Public Policy

3-3 Management of material topics	a. Policy and Partnerships, p. 16 b. Policy and Partnerships, p. 16 c. Policy and Partnerships, p. 16 d. Policy and Partnerships, p. 16 e. Policy and Partnerships, p. 16 f. Policy and Partnerships, p. 16			
415-1 Political contributions		a., b.	Confidentiality constraints	Novolex does not publicly disclose this information.

NON-GRI MATERIAL TOPICS				
Circular Economy				
3-3 Management of material topics	a. Products, p. 8-9; Air, Waste and Water, p. 19-20 b. Products, p. 8-9; Air, Waste and Water, p. 19-20; Novolex Approach to Sustainability; p. 4 c. Products, p. 8-9; Air, Waste and Water, p. 19-20; Novolex Approach to Sustainability; p. 4 d. Products, p. 8-9; Air, Waste and Water, p. 19-20; Novolex Approach to Sustainability; p. 4 e. Products, p. 8-9; Air, Waste and Water, p. 19-20; Novolex Approach to Sustainability; p. 4 f. Products, p. 8-9; Air, Waste and Water, p. 19-20; Novolex Approach to Sustainability; p. 4			
Product Design and Innovative				
3-3 Management of material topics	a. Products, p. 8-9 b. Products, p. 8-9 c. Products, p. 8-9 d. Products, p. 8-9 e. Products, p. 8-9 f. Products, p. 8-9			
Consumer Education				
3-3 Management of material topics	a., b. Consumer education is a critical component of effectively managing the use and disposal of some, but not all, of our packaging products. Our products can support business and supply chain viability, contributing positively to economic livelihood. Environmental impacts from our operations and products are detailed in our report. Novolex believes in the importance of supporting additional consumer education on available product disposal options, so that environmental impact from use of packaging can be minimized following its use. c. Products, p. 8-9 d. Products, p. 8-9 e. Novolex focuses extensively on proper labeling of products that supports proper disposal by consumers. We also promote the use of those labels with our customers. However, we do not track the effectiveness of that labeling. We use recycling and composting rates as an indication of status on consumer knowledge of proper disposal. Data in this area needs to be more robust, and Novolex engagement with policymakers is focused on better data and consumer education. f. Products, p. 8-9			