SUS TAIN ABI LITY

Lyreco

WELCOME TO THE LYRECO SUSTAINABILITY REPORT

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Lyreco

Reporting scope and period

Sustainability information for the period 1 January 2024 to 31 December 2024, including comparative period, 2023. These statements show the full year sustainability information of the Lyreco SAS (Lyreco Group).

About this report

For 2024, the report has been restructured to include a sustainability statement in preparation for compliance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). A full description of the basis for preparation of the sustainability statement is provided on pages 10-26. In preparation of Lyreco's obligation to comply with the Corporate Sustainability Reporting Directive (CSRD) by 2027, the company has recognized the importance of beginning alignment with the CSRD sustainability framework starting in 2024. As a result, this report will focus on three key areas outlined in the European Sustainability Reporting Standards (ESRS): E1 (Climate Change), S1 (Own Workforce), and G1 (Business Conduct). Critical or material events occurring on or after 1 January 2024 and up until the publication date are also covered in this report. Separate GRI tables are available as Appendix.

Lyreco Group obtains limited assurance conducted by SGS for selected ESG metrics. For more information refer to the Independent Assurance Statement is available in the Appendix.

Since 1926, Lyreco has evolved by staying true to our values: respect, passion, agility, and excellence. These values guide us as we deliver sustainably what every workplace needs, so people can focus on what matters most.

Sustainability shapes the way we think, act, and grow as a company. Year after year, we continue to make progress: reducing our environmental footprint, improving our product offering, and strengthening our partnerships with suppliers who share our vision. This is something we all take great pride in.

The year 2024 has been marked by complexity and rapid change, calling for even greater levels of agility. Operating across 25 markets worldwide, we have had to swiftly adapt to evolving commercial realities while staying focused on furthering our sustainability strategy. To achieve this, we embraced a mindset rooted in resilience: **keep making progress**. This recognises that in pursuit of your goals it's okay to slow down, but that you shouldn't stop. This thinking has kept us on track.

At Lyreco, we are energised by a pioneering spirit. For us, this means embracing new challenges with curiosity and confidence. This ethos is reflected in how we are approaching the current partial CSRD implementation: not as a checkbox exercise, but as a valuable tool to drive transparency, responsibility, and continuous improvement.

Progress is not always fast, and it's not always easy. But even **small, steady steps bring us closer to a future that is more sustainable**. This report highlights the tangible actions we've taken over the past year, each one bringing us closer to that vision.

Together, let's keep making progress - and make every day a Great Working Day. Delivered.

Grégory LIENARD

Lyreco at a glance

With 17 local subsidiaries and an expertise centre dedicated to workplace safety, we operate directly in 25 countries in Europe and Asia. In addition, we have set up a network of 13 strategic distribution partners that serve 15 additional markets in North, Central and South America, Europe, and Asia-Pacific. As total 40 markets across 4 continents.

10,000+ employees: Our people are the core of the operational excellence we offer daily to our customers.

Privately owned company for almost 100 years.

10,000 products in stock.

19 national distribution centres.

1 day delivery.

Our mission, vision and values

A GREAT WORKING DAY. DELIVERED.

Be a pioneer in delivering sustainably what any workplace needs so its people can focus on what matters most.

Values

Excellence: We strive for perfection in everything we do.

Passion: We really care for our customers.

Respect: We believe in trust, respect and ethical behaviour.

Agility: We anticipate, innovate and adapt to change.

Sustainability journey and 2024 highlights

At Lyreco, we aim to drive positive change in all ESG areas: environmental, social, and governance. Transparency is fundamental to our relationships with our customers, our suppliers, and our stakeholders, as we aim to meet their expectations through clear communication and action. We uphold strict standards across our subsidiaries, implementing ISO 9001:2015 and ISO 14001:2015 in our Integrated Management System.

Since 2009, we have partnered with EcoVadis to assess our sustainability efforts. In 2024, we earned an EcoVadis Gold Medal. This achievement places us in the "Advanced" level of sustainability management, reflecting our commitment to addressing key economic, environmental, and social issues in the goods wholesaling industry.

In 2024, Lyreco began adopting the European Sustainability Reporting Standards (ESRS) framework to further standardize its sustainability efforts, progress tracking, and reporting practices in alignment with customer expectations.

1997 — ISO 14001

First ISO 14001 certification awarded in Sweden. Subsequently all subsidiaries gain ISO 14001 certification by 2009.

2004 — GLOBAL COMPACT

Lyreco becomes the first company in the office supply industry to join the UN Global Compact.

2008 — E-Van

First electric van purchased by Lyreco.

2009 — ecovadis

EcoVadis measures the quality of Lyreco's sustainability management system, focusing on Environment, Labour & Human Rights, Ethics and Sustainable Procurement.

2012 — EU ECOLABEL on branded products

Lyreco starts to apply the EU Ecolabel to its own brand products.

2012 — Lyreco Green Tree label

Lyreco implements its unique Green Products Assessment Methodology and its own Green Tree label.

2013 — SMETA & BSCI for audits

Lyreco selects SMETA and BSCI as validated standards for the social accountability audits of the factories that manufacture Lyreco branded products.

2015 — Photovoltaic panels

The first photovoltaic panels are installed. In 2016, the first subsidiary achieves energy net zero by generating more electricity than it consumes.

2017 — NORDIC SWAN for cartridges

Lyreco selects the Nordic Swan label for its remanufactured toner

2018 — FSC International Members

As member of the Forest Stewardship Council (FSC), Lyreco understands the importance of responsible forestry management.

2019 — Endorsement of NYDF

Lyreco endorses the New York Declaration on Forests, which aims to halve deforestation by 2020 and end it by

2020 — CDP

Lyreco employs CDP global environmental impact disclosure system.

2022 — Lyreco Sustainable Selection

Lyreco sustainable procurement process is following the ISO 20400 principles validated by SGS.

2023 — SBTi

SBTi approves Lyreco's CO2e reduction targets, including supplier engagement target.

2024 — CSRD

Lyreco started standardizing its Sustainability Report to meet CSRD and ESRS requirements.

Our sustainability commitments - SDGs

Our sustainability goals are closely aligned with the United Nations Sustainable Development Goals (SDGs), which we recognise as essential frameworks for driving our global progress. These goals underpin our ambition to foster long-term value for all stakeholders while advancing environmental, social, and economic resilience. By integrating the SDGs into our strategic approach, we aim to serve as a model for responsible practice and to inspire broader adoption of sustainability principles. We believe collective action is needed to achieve a more sustainable future for all.

Responsible consumption and production

Our primary focus is on developing products that protect the planet and its population. We take pride in offering sustainable and recycled office supplies, empowering customers to make environmentally conscious choices. High-performing sustainable products are prominently featured in our catalogue to encourage their adoption. Additionally, we support circular economy practices through dedicated product collection services. These initiatives directly support SDG 12: Responsible Consumption and Production.

Climate action

Addressing climate change is a foundational pillar of our sustainability strategy. As part of the Science Based Targets initiative (SBTi), we are implementing targeted emissions-reduction measures across our operations and supply chain. Strategic investments in energy-efficient infrastructure and the deployment of a low-emission vehicle fleet have yielded measurable reductions in greenhouse gas emissions, aligning with SDG 13: Climate Action.

Partnerships for the goals

Collaboration is essential to drive sustainable progress. We are actively forming partnerships with suppliers and other stakeholders to develop innovative solutions to sustainability challenges. These alliances enhance our capacity for impact and are integral to achieving SDG 17: Partnerships for the Goals.

Our sustainability ratings and certification

Since 2009, we have voluntarily participated in EcoVadis assessments, consistently ranking among the top 5%. In 2024, Lyreco Group received the EcoVadis Gold Medal with a score of 80 out of 100, narrowly missing the Platinum level by one point. Our score improved by eight points compared to 2023 and we scored 100 out of 100 in the environmental category, driven by enhanced reporting in all four core assessment areas. This achievement positions us within the top 2% of all companies assessed by EcoVadis.

This is our third year participating in the Carbon Disclosure Project (CDP), reinforcing our commitment to transparency and accountability in climate-related performance. As a voluntary initiative, CDP supports our efforts to track progress against our climate goals. We improved our rating to a B in 2024, up from a C in 2023, reflecting strengthened climate action and reporting.

In addition to our improved rating, Lyreco Group was also recognized on CDP's 2024 Supplier Engagement Assessment (SEA) A List. This achievement highlights our strong performance in engaging with suppliers on climate-related issues, including governance, target-setting, Scope 3 emissions, and value chain collaboration.

ISO 14001:2015 and ISO 9001:2015

All countries are assessed and certified as meeting the requirements of ISO 14001:2015 and ISO 9001:2015.

ISO 45001:2018

40% of our countries are assessed and certified as meeting the requirements of ISO 45001:2018 on occupational health and safety management system.

ISO 26000:2021

Although Lyreco as a group is aligned to ISO 26000:2021, we have only two subsidiaries, Lyreco Norway and Lyreco Sweden, that have been audited on their conformity by RISE Research Institute of Sweden.

ISO 27001:2013

A pioneer experience in information security has been carried out in the UK, which is the first country in our group to have been assessed and certified as meeting the requirements of ISO 27001:2013.

SUSTAINABILITY STATEMENT

General information – ESRS 2 General disclosures

Lyreco

ESRS 2 BP-1 General basis for preparation of the sustainability statement

The sustainability statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS) and Article 29b of the Accounting Directive as amended by the Corporate Sustainability Reporting Directive (CSRD).

Our ambition has been to implement as many of the European Sustainability Reporting Standards possible in our 2024 Sustainability Report which is separate from the management report. Information included in the sustainability statement concerns Lyreco SAS and all its subsidiaries.

The sustainability statement includes information covering material impacts, risks, and opportunities across our upstream (e.g., suppliers, procurement) and downstream (e.g., customers, product use and end-of-life) value chain, in accordance with the principle of double materiality. The content of the sustainability statement is based on the outcome of our double materiality assessment initiated in 2024 and continuing in 2025. While full value chain data is not yet available for all the ESRS topics, we are progressively enhancing data collection processes and supplier/customer engagement to expand coverage in subsequent reporting cycles. No omissions have been made based on the protection of intellectual property, know-how, or the results of innovation. Should any such omission be required in future reports, we will provide a clear justification in accordance with the requirements of the ESRS.

However, given that the assessment of certain standards, such as ESRS E2, E5, S2 and S4, is still ongoing, the 2024 sustainability statement focuses on the most clearly confirmed material topics: Climate change (E1), Own workforce (S1), and Business conduct (G1). Additional disclosures will be considered in subsequent reporting periods, once the materiality of these areas is fully confirmed through our ongoing double materiality assessment process.

ESRS 2 BP-2 Disclosures in relation to specific circumstances

Changes in the preparation or presentation of sustainability information

For the 2024 reporting period, we have structured our sustainability disclosure to prepare for partial compliance with the CSRD, implemented by the ESRS. These changes include:

- The inclusion of a sustainability statement within our annual sustainability report that is structured in accordance with the requirements of the ESRS.
- A double materiality assessment that was conducted in accordance with the requirements of ESRS to identify material impacts, risks and opportunities across our own operations, upstream and downstream value chain.
- New disclosures and metrics as required by the ESRS, including descriptions of material impacts, risks and opportunities, and policies, actions, metrics and targets to address them.

Disclosures stemming from other legislation or other sustainability reporting standards

The disclosures also include information presented in reference to the GRI standards. This information is clearly identified in the sustainability statement.

List of data points deriving from other EU legislation (IRO 2)

Data Point	Source EU legislation	Context / ESRS DR
Sustainability Statement preparation	CSRD / Article 29b of EU Accounting Directive (Directive 2013/34/EU)	ESRS 2 BP-1, BP-2
GHG emissions reporting & Scope 3 estimates	EU Taxonomy Regulation / GHG Protocol	ESRS E1-6, E1-7
Climate transition targets validation	Science Based Targets Initiative (SBTi) — endorsed in EU frameworks	ESRS E1-1 to E1-5
Energy consumption reporting	Energy Efficiency Directive (EED)	ESRS E1-5
Waste and circular economy metrics	Waste Framework Directive (2008/98/EC)	ESRS E5 – Sustainable Selection
Supplier due diligence & risk auditing	French Vigilance Law, German Supply Chain Act, Norwegian Transparency Act	ESRS G1-2
Whistleblower protection system	EU Whistleblower Directive (2019/1937)	ESRS G1-1
Protection of personal data	General Data Protection Regulation (GDPR)	ESRS G1-1, S1-6
Anti-corruption and bribery policies	Sapin II, UK Bribery Act, UN Convention Against Corruption (UNCAC), FCPA	ESRS G1-3, G1-4
Fair payment practices for suppliers (esp. SMEs)	Late Payment Directive (2011/7/EU)	ESRS G1-2
Equal treatment & diversity	EU Equality Framework Directive (2000/78/EC)	ESRS S1-9
Health & safety frameworks	EU OSH Framework Directive (89/391/EEC) / ISO 45001 integration	ESRS S1-14
Worker consultation and representation	Directive 2002/14/EC on Information & Consultation of Employees	ESRS S1-7, S1-8
Information and IT security governance	NIS Directive (EU 2016/1148) / GDPR	ESRS G1-1
Sustainable finance alignment	Sustainable Finance Disclosure Regulation (SFDR)	ESRS E1-3, E1-4
Circular product labeling	EU Ecolabel Regulation (66/2010/EC)	ESRS E5 – Circular Economy Pledge
Ethical sourcing and animal welfare	EU Animal Welfare Regulations	ESRS G1 – Supplier Code of Ethics

Updating disclosures about events after the end of the reporting period

Some critical or material events occurring in or after December 2024, up until the publication date, have been included in the sustainability statement.

Definitions of medium or long-term time horizons

We define the short-term as the reporting period in our financial statements (from 2024 to 2025), medium-term as the period from the end of the short-term reporting period to five years (from 2026 to 2030) and the long-term as more than five years (from 2030), in line with our strategic and climate objectives.

As of now, we have not applied different time horizon definitions across ESRS topics. If a different definition is required due to the nature of a specific sustainability matter (e.g. product lifecycle), this will be explicitly justified in the relevant disclosure.

Metrics that include value chain data estimated using indirect sources

Several value chain-related metrics, such as Scope 3 GHG emissions, include estimated data derived from indirect sources such as industry databases, emission factors (e.g., DEFRA, ADEME), and supplier questionnaires. These estimations are currently necessary where direct data is unavailable.

The preparation of estimated value chain metrics relies on spend-based models, emission factors, and average industry benchmarks. These are applied in line with GHG Protocol guidance and will be refined as supplier- or product-specific data becomes available.

Given reliance on generic data and proxies, the current level of accuracy for value chain-related metrics is moderate. This is especially true for categories such as purchased goods and services (Scope 3.1) and downstream transportation (Scope 3.9), where specific primary data is not yet fully collected.

Planned actions to improve accuracy of metrics

To improve accuracy, we are implementing measures such as:

- Expanding supplier engagement and data collection.
- Strengthening data management systems.
- Integrating ESG clauses and data-sharing requirements into procurement contracts.
- Exploring partnerships with ESG platforms and databases to enhance upstream and downstream visibility.

SUSTAINABILITY GOVERNANCE

GOV-1 The role of the administrative, management and supervisory bodies

Governance structure and role in sustainability oversight

Lyreco is a privately owned company. Strategic and operational leadership is provided by the Group Executive Team (GET), which serves as the highest governance body in the organisation.

Sustainability is embedded within our overall business strategy. The GET receives regular updates—at least quarterly—from the Group Sustainability team on key sustainability topics, including performance indicators, material impacts, and progress on sustainability-related targets. These updates support informed decision-making and alignment with the Group's strategic priorities and risk management practices. They also enable the GET to assess sustainability-related risks and opportunities, both in the short and long term. The GET also reviews and validates our annual Sustainability Report prior to its publication.

Composition of the Group Executive Team

As of the reporting date, the Group Executive Team is composed of eight executive members, of whom two are women and six are men, representing a gender ratio of 25% to 75%. Strategic oversight is provided by the company's ownership, in coordination with the Group Executive Team.

Further information on gender diversity is provided in disclosure S1-5.

Employee and worker representation

There are currently no formal employee or worker representatives in the Group Executive Team. However, employee perspectives are regularly collected through structured engagement initiatives, such as company-wide surveys, feedback tools, and dialogue platforms. These mechanisms ensure that employee insights inform strategic decision-making and contribute to a culture of continuous improvement and inclusion across the organisation.

Where required by national law, employee representation exists in local governance bodies such as works councils. At the Group level, employee perspectives are also channelled through the European Works Council.

GET members' experience relevant to sectors, products and geographic locations

Members of our Group Executive Team collectively possess extensive expertise in areas critical to our operations. This includes deep experience in the wholesale and distribution sectors, particularly in office and workplace solutions, as well as in digital transformation, logistics, sustainability, and supply chain strategy. Additionally, they bring strong capabilities in product development and sales management.

From a geographic perspective, the team has significant leadership experience across Europe and the Asia-Pacific region, reflecting the Group's multinational footprint and strategic priorities.

GOV-2 Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

Frequency and channels of sustainability updates

At Lyreco, the Group Executive Team receives quarterly reports from the Group Sustainability team, covering material sustainability impacts, risks, opportunities, and performance against

key objectives. These are complemented by monthly briefings to monitor ongoing initiatives, due diligence processes, and risk mitigation efforts.

Departmental managers are also kept informed through regular updates aligned with strategic and operational planning.

Integration of sustainability in strategy, risk and business decisions

The GET incorporates sustainability into strategic planning by considering climate and regulatory risks, social expectations, and opportunities for innovation. For major decisions, such as acquisitions or new ventures, ESG factors are evaluated through due diligence processes. Sustainability risks are also embedded in the Group's risk management framework and reviewed regularly by the Group Executive Team.

HOW SUSTAINABILITY IS INTEGRATED INTO INCENTIVE SCHEMES

ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes

We include sustainability-related performance in the incentive schemes for the chief sustainability officer and the Group Sustainability director. Sustainability-related objectives are embedded as part of the annual performance assessment criteria. Sustainability-related targets used to assess performance include:

Reduction of Scope 1 and 2 greenhouse gas emissions, and progress towards achieving the Scope 3 supplier engagement target.
Supplier sustainability performance (Sustainability & Product Assessment, social compliance supplier audit).
ESG assessments — EcoVadis and CDP.
Progress on circular economy initiatives (Circular Economy Pledge).
Progress on sustainable product portfolio (Sustainable Selection).

Sustainability metrics are explicitly referenced in remuneration guidelines as non-financial performance indicators. Achievement of these targets affects annual bonuses.

STATEMENT ON DUE DILIGENCE

GOV-4 Statement on due diligence

Our due diligence process is designed to identify, manage, and mitigate environmental, social, and governance (ESG) risks across our operations and supply chain. We strive to be compliant with the French Vigilance Plan Law and the Norwegian Transparency Act, and are aligned with international standards and internal governance frameworks promoting transparency, ethical conduct, and sustainability.

Key elements of the due diligence process

Risk identification and assessment

We apply the AMFORI Country Risk Mapping methodology and indexes such as ITUC, CCPI, CRI, WWF, BRF, KidsRights to evaluate supply chain risks by country. High-risk suppliers and factories are identified through combined analysis of audit results, ISO certifications, and location-specific risks.

Preventive and corrective measures

All suppliers must comply with our Supplier Code of Ethics and the Sustainable Procurement Policy. Sustainability audits and regular assessments are conducted to ensure ongoing compliance. Identified non-conformities lead to corrective actions, including follow-ups and tailored improvement plans.

Ethics and whistleblowing mechanisms

Our "Raise Your Concern" platform enables both internal and external stakeholders to report potential ethical violations. In 2023/2024, a total of 22 reports were submitted, nine of which led to investigations, while 13 required no further inquiry. We successfully resolved two major supply chain cases related to conflict of interest and forced labour. All investigations are conducted in a transparent and systematic manner.

Anonymous reports are not processed, except in countries where local legislation explicitly requires it. As a result, the KPI calculation excludes unregistered anonymous alerts and any local reports handled outside of the Group-wide "Raise Your Concern" tool.

Monitoring and auditing of supplier performance

We monitor our suppliers through annual sustainability assessments. Surveillance audits are conducted yearly in high-risk countries (e.g., India, China, Malaysia, Thailand) by independent, internationally recognised firms (e.g., SGS, TÜV, Intertek), based on standards such as SEDEX and BSCI. Moreover, we apply enhanced monitoring, and targeted improvement plans in these regions.

Suppliers that fail to meet required standards and show no progress are subject to disengagement procedures. Sites with persistent non-conformities may be placed on a blacklist.

Our full due diligence process, including stakeholder engagement and grievance management, is described across multiple sections in the sustainability statement and reflects our commitment to responsible business conduct.

SUSTAINABILITY RISK MANAGEMENT

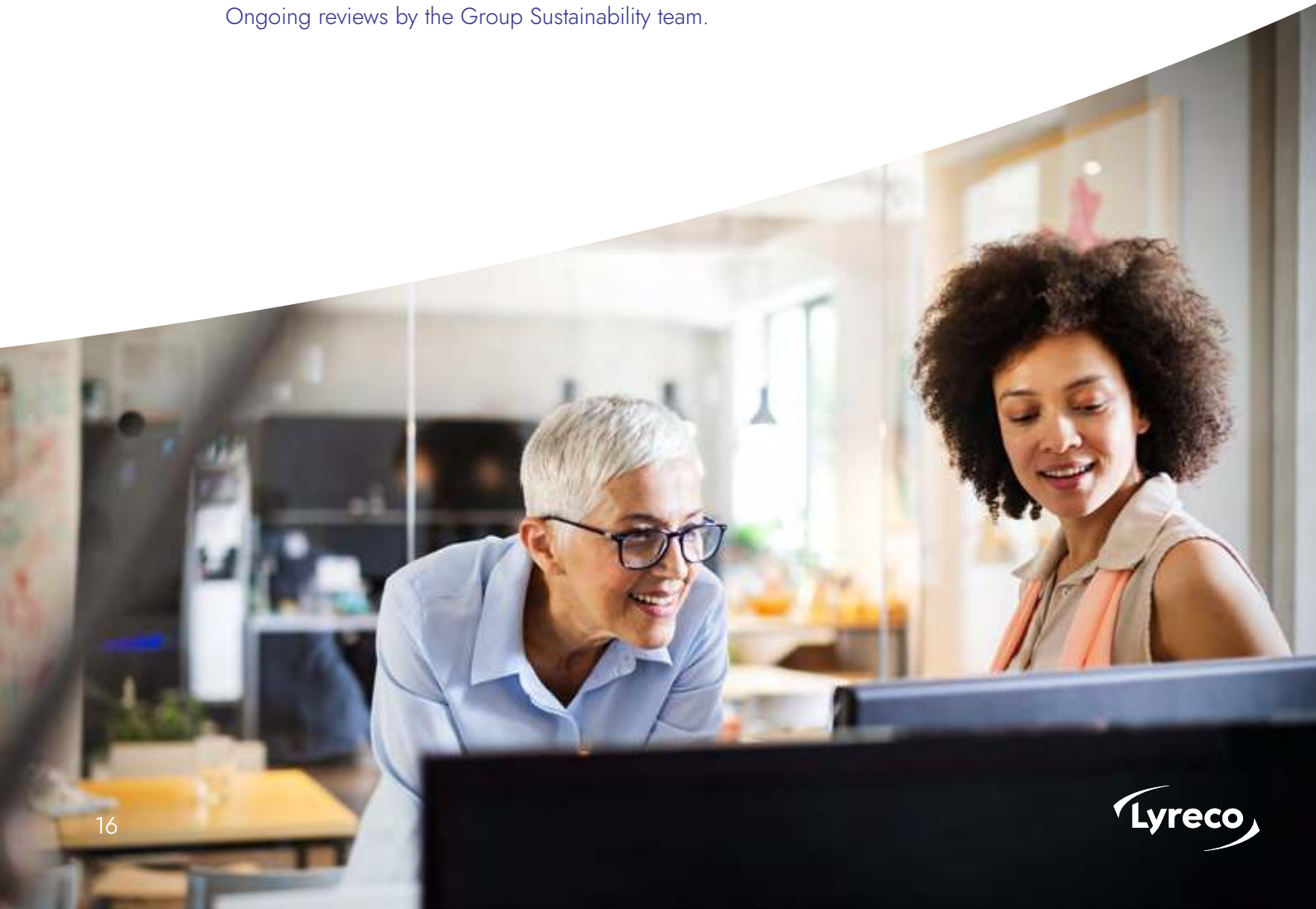
GOV-5 Risk management and internal controls over sustainability reporting

Our sustainability reporting is subject to risks such as human error, inconsistent data quality across countries, and challenges related to the first-time implementation of the ESRS-aligned metrics. To manage these risks, our Group Sustainability team, led by the Group Sustainability Director, is responsible for consolidating group-wide data through structured surveys and dedicated reporting software. This system ensures standardisation, traceability, and automation of key metrics, including consistent use of terms, formulas, and emissions factors in line with the GHG Protocol.

Selected ESG data, including GHG emissions, social and governance KPIs, is subject to limited assurance by SGS and detailed in the auditor's assurance statement.

The internal control system includes:

- Clear definition of roles and responsibilities.
- Annual validation and consolidation of Group data.
- Internal KPI dashboards and tracking tools.
- Ongoing reviews by the Group Sustainability team.



OUR STRATEGY AND BUSINESS MODEL

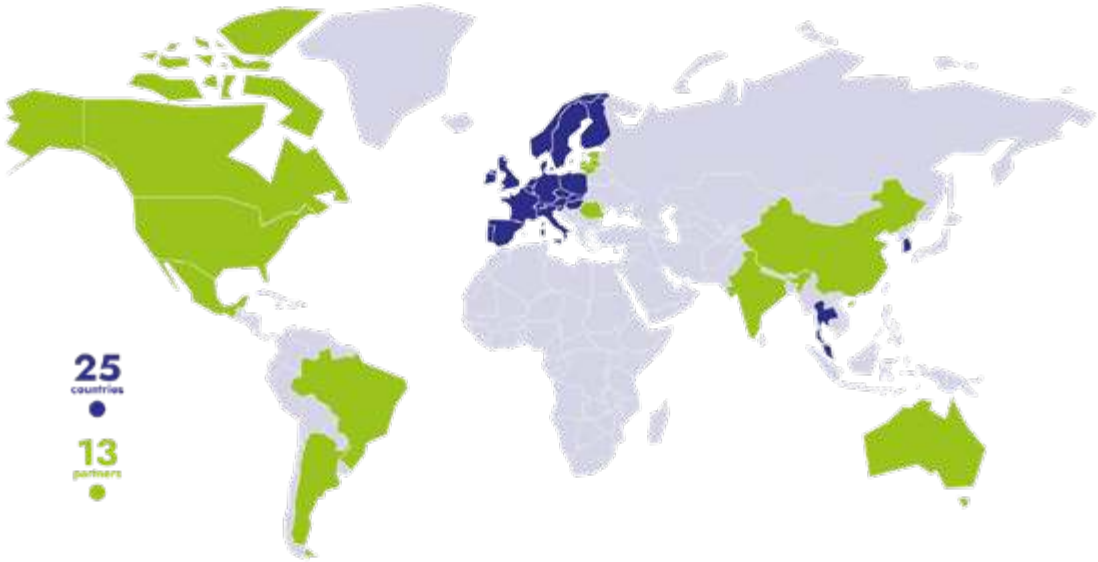
"Deliver sustainably what any workplace needs, so its people can focus on what matters most".

SBM-1 Strategy, business model and value chain

The Lyreco Group is much more than a supplier of workplace essentials. We partner with organisations in the quest for a better working world, one day at the time.

We collaborate with leading suppliers to offer an increasing number of products that contribute to sustainability. Additionally, we provide the necessary information to help people understand the impact of their purchases. We also build strong relationships with our partners to drive progress in sustainability within different workplaces.

We operate directly in 25 countries in Europe and Asia and cover 16 additional markets on four continents through a network of distribution partners. As the European leader and the third largest distributor of workplace products and services in the world, we strive to work in an ethical and sustainable way in our local communities to promote well-being and safety amongst the people that live and work there.



13 partners in 15 countries

Europe: Estonia, Latvia, Lithuania, Romania, Turkey

Asia-Pacific: Australia, China, India, New Zealand, Taiwan

South America: Argentina, Brazil, Mexico

North America: Canada, United States

Present in 25 countries

Europe: Austria, Belgium, Czech Rep., Denmark, France, Finland, Germany, Hungary, Ireland, Italy, Luxemburg, Netherlands, Norway, Poland, Portugal, Slovakia, Spain, Sweden, Switzerland, UK

Our key success factors—agility, customer-centricity, geographic reach, and industry knowledge—are the pillars of our business model. With the **GREAT2026** strategy, we pursue ambitious growth and acquisition objectives to strengthen our position in key markets and sectors and to secure sustainable long-term development.

Our commitment to inspire greatness in the workplace, it is our springboard to how we get to a great working day, delivered.

Our value chain covers the following key activities:

Sourcing and procurement: Collaboration with suppliers across categories (office supplies, IT products, hygiene and cleaning, personal protective equipment, furniture, catering, etc.).

Product design and supplier engagement: Emphasis on quality, safety, environmental standards, and increasing share of sustainable products.

Warehousing and logistics: Centralised and local warehouses, fleet operations, and last-mile delivery (including own delivery fleet).

Sales and customer service: Multichannel approach with e-commerce platforms, sales reps, and account managers.

After-sales services and reverse logistics: Including waste collection solutions, repair services, and take-back schemes.

Our product and service offering includes:

Office products, paper, and stationery.

Personal protective equipment (PPE).

Cleaning and hygiene products.

IT and electronics.

Furniture and ergonomic equipment.

Catering supplies and coffee solutions.

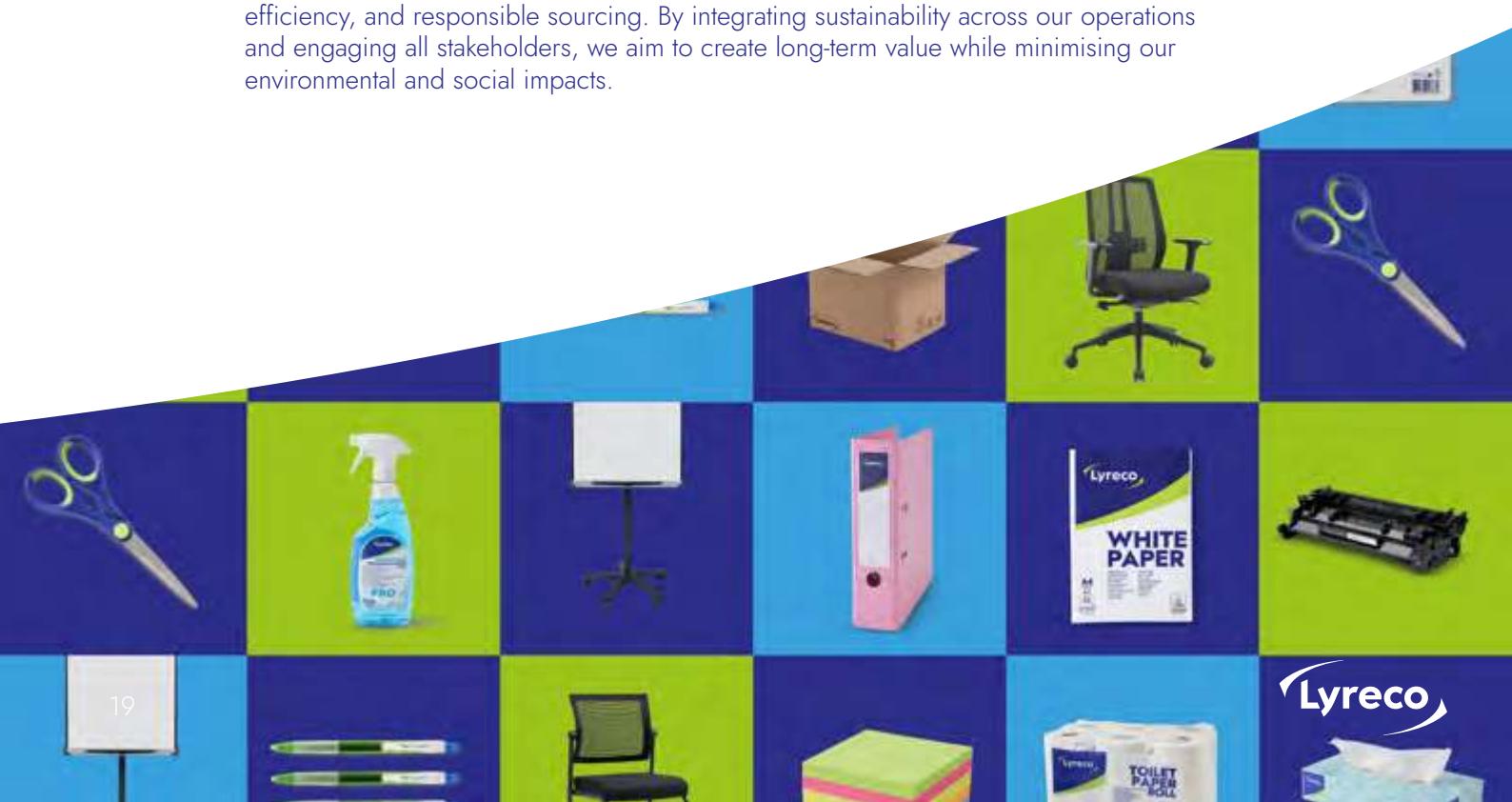
Workplace services (installation, maintenance, recycling, training, etc.)

Our core customers are B2B clients, both public and private, including multinational corporations, SMEs, and public sector organisations. We serve a wide range of sectors, including industry, education, healthcare, retail, and administration.

Strategically, we are implementing the GREAT2026 roadmap to accelerate sustainable growth. The strategy focuses on:

- Expanding our product and service offering.
- Strengthening local and international logistics.
- Investing in digitalisation and data.
- Enhancing sustainability and circular economy integration.
- Pursuing targeted acquisitions to support geographical and sector diversification.

The business model is built on proximity to customers, service excellence, operational efficiency, and responsible sourcing. By integrating sustainability across our operations and engaging all stakeholders, we aim to create long-term value while minimising our environmental and social impacts.



OUR STAKEHOLDERS

SBM-2 Interests and views of stakeholders

Stakeholder engagement is a critical part of our sustainability strategy. It supports the identification of material issues, assessment of actual and potential impacts, and the alignment of our business model with stakeholder expectations. Regular communication, feedback mechanisms, and collaboration help foster transparency and long-term value creation.

Stakeholder views inform our strategic decisions in many areas—from developing sustainable solutions that reduce our customers' supply chain emissions, to creating an inclusive and meaningful workplace, and ensuring we operate with integrity in all markets.

Engagement activities are typically led by the Group Sustainability team, in collaboration with the Sustainability Community, People & Culture, Finance, Legal & Compliance, and the Group Executive Team.

The table below outlines our main stakeholder groups, how we engage with them, the purpose of these engagements, and the outcomes. Stakeholder input directly informs our due diligence process and materiality assessment, described further in IRO-1.

Stakeholder	Purpose and objectives	What is being addressed?	How is the dialogue carried out?	Outcome
Customer	Deliver quality products, with good customer service and cooperation for sustainable development.	Accessibility, transparency, competitiveness, quality, customer value, product range development, eco-labeled and climate-smart products, reuse and recycling solutions, delivery terms and conditions.	Meetings/conversations, customer surveys, interviews, lectures, training sessions, webinars, social media, goal setting, and workshops.	Basis for management review and revision of strategy and action plans: Climate reviews, focus on environmental and recycled materials, climate impact, circular services, and increased transparency.
Employee	Ensure a safe, reliable, and sustainable work environment with engaged employees.	Health, environment, safety, good working conditions, career opportunities and courses, compensation and bonus, diversity, motivation.	Employee dialogues, information meetings, engagement surveys - GPS, reports, newsletters, intranet, social media, training and courses, department meetings, townhalls, Convention, and internal social media.	Basis for management review and revision of strategy and action plans: sustainability focus (health, environment, product use), and process efficiency improvements.
Supplier/ Partner	Ensure sustainable development, fair competition, and good tender processes.	Supplier control, transparency, risk assessment, terms, resource efficiency, ethics, environment, and sustainability.	Supplier assessment, meetings, Product Climate Footprint (PCF), presentations, evaluation, reporting, revision, cooperation, workshops, Convention, joint goal setting - SBTi.	Basis for management review and revision of strategy and action plans: risk assessments, PCF, climate impact, development of eco-labeled and recycled materials in the assortment, and circular solutions.
Owner	Generate sustainable growth with returns for owners over generations.	Corporate governance, ethics, anti-corruption, health and safety, strategies and sustainability.	Reports, meetings, press releases, indexes, and sustainability assessments.	Input for management's focus and strategies for sustainable business development.
Countries / subsidiaries	Generate sustainable growth with minimal environmental impact by delivering on sustainability strategy.	Corporate governance, executive management, policies, strategies, ethics, anti-corruption, health, and safety.	Reports, meetings, press releases, indexes, sustainability assessments, and employee surveys.	Basis for group management meetings. Forms part of Lyreco countries' involvement in shared quality and sustainability projects.
Environment and nature	Create growth with minimal negative environmental impact and maximize positive impact.	Sustainable development, resource efficiency, resilience, health, and recycling.	Environmental descriptions, ISO 14001 certification, carbon footprint calculations, Planet Program, CE Pledge.	Basis for management review and revision of strategy and action plans: Climate reviews, PCF, and support for biodiversity and circular projects.

Engagement methods

We tailor engagement approaches to each stakeholder group. Common methods include:

- Surveys and feedback tools for employees and customers.
- Regular dialogue with suppliers and communities.
- Research (e.g., MSCI risk matrices, ESG benchmarking).
- Annual sustainability reporting and stakeholder updates.
- Formal advisory panels and expert consultations.
- Regular ESG briefings to management.

Dedicated teams across functions support this process, ensuring consistent monitoring and follow up.

Stakeholder engagement enables us to:

- Identify and understand stakeholder concerns, expectations, and needs.
- Determine material sustainability issues across our value chain.
- Align business strategy and operations with stakeholder priorities.
- Build trust and transparency, strengthening long-term relationships.

The outcomes of stakeholder engagement are integrated into decision-making processes at all levels. Key findings from stakeholder dialogues are presented to senior management and incorporated into strategy reviews, materiality assessments, and risk management frameworks. Stakeholder insights are shared with the Group Executive Team through Group Sustainability director reports and dedicated sessions on ESG matters. This feedback ensures that our sustainability actions are responsive to evolving stakeholder needs.

We actively gather insights from stakeholders through various channels (e.g., surveys, focus groups, one-on-one meetings) and track key metrics such as customer satisfaction, employee engagement, and community impact. We use these insights to better align our business model with stakeholder expectations and to drive improvements across our operations.

Our strategy is continuously refined to address stakeholder interests, especially those related to sustainability. Recent amendments have focused on increasing transparency in reporting, incorporating product carbon footprint data, strengthening our supply chain sustainability, and enhancing employee engagement in ESG initiatives.

The business model has been adjusted to:

- Prioritise sustainable product development and lifecycle management.
- Integrate ESG factors into procurement practices.
- Foster a more inclusive culture by enhancing diversity and employee well-being.

These adjustments reflect the feedback from key stakeholders, such as customers seeking

more sustainable products and employees advocating for greater diversity.

To further respond to stakeholder interests, we plan to:

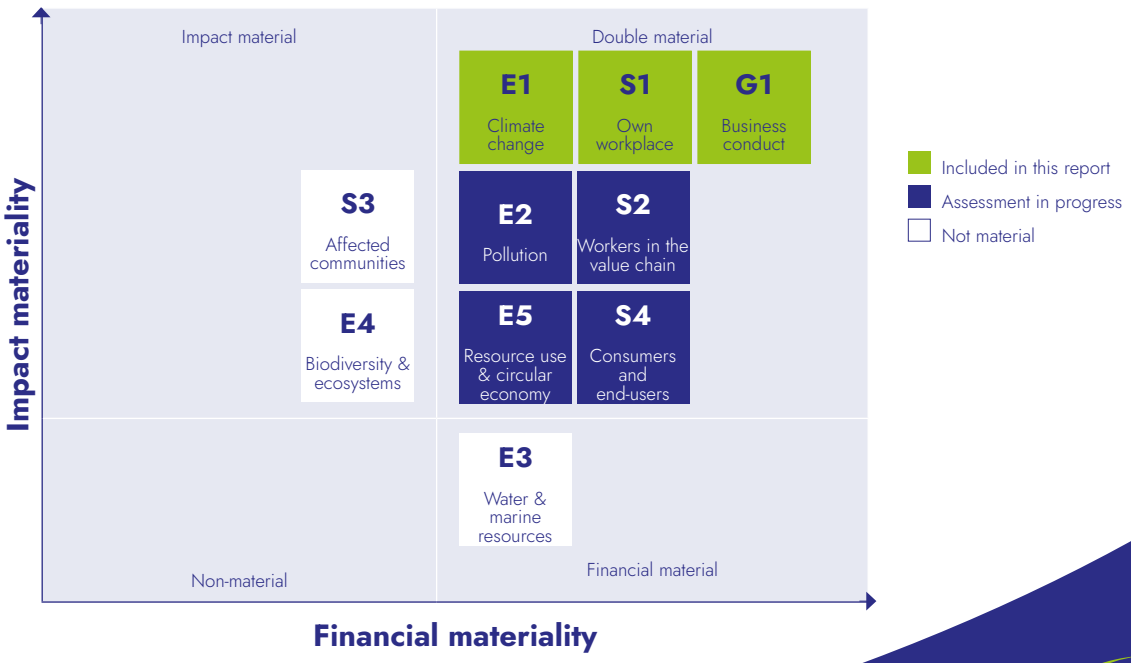
- Strengthen employee sustainability training by the end of 2025.
- Implement enhanced ESG reporting aligned with CSRD and TCFD by Q2 2026.
- Finalise our 2030 Sustainability Strategy by Q2 2026.
- Improve internal controls to manage ESG-related financial risks by end of 2026.
- Increase cross-functional accountability for sustainability actions.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES ESRS

2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Our materiality assessment has identified several sustainability-related impacts, risks and opportunities that are deeply connected to our strategy, business model, and value chain. These relate primarily to climate change, supply chain resilience, employee well-being, and business conduct—each carrying significant implications for both people and the planet.

The material topics identified during the materiality assessment are presented in the graph below and described in the sustainability statement under ESRS E1 Climate change, S1 Own workforce, and G1 Business conduct.



Effects of material impacts, risks and opportunities on business model, value chain, strategy, and decision-making

The identified material impacts and their associated risks and opportunities are already shaping key dimensions of our business:

Business model transformation: We are actively evolving our model to prioritise asustainable sourcing, low-carbon logistics, and circular economy principles. This transition is essential to mitigate risks linked to climate change, resource scarcity, and regulatory shifts.

Value chain resilience: By strengthening partnerships with sustainable suppliers and investing in energy-efficient technologies, we aim to build a more resilient and future-ready value chain.

Informed decision-making: Sustainability-related risks and opportunities are now embedded in strategic planning and investment decisions. This integration ensures alignment with stakeholder expectations, regulatory frameworks (e.g., CSRD), and our long-term value creation goals.

Time horizon considerations

Short-term: We anticipate increased investment in energy-efficient infrastructure, low-impact logistics, and sustainable product innovation. These may raise costs temporarily but lay the groundwork for long-term savings and risk mitigation.

Medium-term: Enhanced customer demand for sustainable products and improved operational efficiency are expected to support stronger financial performance.

Long-term: We envision a shift to a fully sustainable, circular business model, unlocking new revenue streams, ensuring greater resource security, and reinforcing brand trust.

Activities or business relationships involving material impacts

The activities and business relationships contributing to material impacts include:

Greenhouse gas (GHG) reduction efforts: Implementing decarbonisation actions across operations and logistics, supported by energy efficiency projects and product carbon footprint monitoring.

Business conduct and ethics: Maintaining strong compliance and integrity standards through codes of conduct, anti-corruption measures, and supplier due diligence, to prevent adverse impacts and strengthen responsible business practices.

Supply chain management: Partnering with suppliers to improve the sustainability of materials and reduce carbon emissions.

Product sourcing: Prioritising a sustainable product offering.

Employee engagement: Running health and safety programmes and sustainability awareness initiatives for employees.

MATERIALITY ASSESSMENT PROCESS

MATERIALITY ASSESSMENT

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

In 2024 and continuing in 2025, we conducted a materiality assessment in accordance with the requirements of the ESRS. This included identifying and objectively scoring impacts, risks, and opportunities (IROs), as a basis for the materiality decision of the sustainability matters, resulting in a double materiality assessment (DMA).

Identifying sustainability matters

The identification of material impacts focuses on activities with significant environmental and social footprints, such as logistics, packaging, and supplier operations. Particular attention is given to business relationships in high-risk geographies, including countries with limited regulatory enforcement or high exposure to labour and environmental risks. Factors such as the scale of operations, the nature of the product category, and supplier practices inform this focus.

First, we considered the context of our activities and business relationships, value chain, and affected stakeholders to identify relevant sustainability matters as outlined in ESRS 1, paragraph AR16. The analysis included research on ESG indices relevant to our industry to provide a sector-specific perspective and to allow for the possible inclusion of entity-specific topics.

The identification process was launched through a face-to-face workshop bringing together sustainability experts from across Lyreco. This collaborative approach ensured a strong foundation rooted in the collective expertise of our people.

As the DMA process was not finalised in 2024, we decided to disclose information related to three material topical standards: ESRS E1, S1, and G1. Additionally, we included information on some key initiatives related to other topical ESRS, such as Circular Economy Pledge related to ESRS E-5. Sustainability topics and sub-topics that were not relevant to our business model were omitted from the review.

Materiality scoring approach

The materiality assessment's scoring methodology and criteria were undertaken in accordance with the requirements in ESRS 1, focusing on:

Impact materiality: Scale, scope, irremediability, and likelihood of impacts (based on whether an impact is positive/negative and actual/potential). The threshold for human rights-related impacts was lowered based on ESRS 1 (45) requirements.

Financial materiality: Financial magnitude of risk/opportunity, likelihood, and the nature of the financial effect.

The scoring of the identified IROs was performed by the Group and local department representatives to the best of their ability. All IROs were scored at a gross level. Where

possible, the time horizons and quantitative and qualitative thresholds applied in the scoring of the IROs were based on those used in our risk management framework. This also ensured that the sustainability-related risks and opportunities were aligned with other enterprise risks and opportunities that we have identified.

Stakeholder engagement

Internal representatives from each relevant department who had deep knowledge of affected stakeholders, and users of sustainability statements, were designated as stakeholder representatives to provide insights into the sustainability matters, and identify and score the IROs. This was a key element of the process.

Each sustainability matter was reviewed through an interview with the designated stakeholder representative conducted by the Group Sustainability project manager for impacts, and by the Group internal controller for risks and opportunities, with a focus on identifying IROs at a sub-topic level. The analysis also considered whether any risks and opportunities could derive from the financial effects of any of the identified impacts or dependencies.

Decisions and internal control procedures

Key decisions taken in the process involved the selection of stakeholder representatives, the scoring of each IRO by the stakeholder representative who identified the sustainability matter, and the final evaluation of sustainability matters by the Group Sustainability team. Internal controls were applied throughout the process. To be considered for materiality, a sustainability matter must have been identified by a stakeholder representative and have an IRO associated with it.

Future steps: Integration, monitoring, and review

Once the DMA has been completed, we will consider integrating the results into our management systems.

We commit to annually revisiting the DMA process to identify, assess, and prioritise IROs, taking into account evolving trends, underlying assumptions, context, and regulatory changes.

As this is the first reporting cycle that a DMA has been conducted in, there are no process changes to report.

Output from the materiality assessment

In total, **112** IROs were identified and evaluated during the DMA. Of those, **64** were deemed material. **71** risks and opportunities were identified, of which **35** were deemed material. The IROs were consolidated and mapped to all material sustainability matters.

The IRO-2 disclosures that include the index of ESRS disclosure requirements and the list of data points that derive from other EU legislation can be found in the Appendix.

PLANET
ENVIRONMENTAL INFORMATION

Lyreco

CLIMATE CHANGE - SUSTAINABILITY REPORT 2024

ESRS E1 - climate change strategy and approach

At Lyreco, we are willing to further strengthen our ability to adapt our strategy and business model to climate change.

While sustainability is embedded in our operations, we understand the necessity of a detailed evaluation of our company's exposure to climate risks across logistics, fleet operations, supply chain management, and energy consumption and are in the process of defining climate-related risks as part of our broader global risk assessment.

Double materiality assessment

As part of our double materiality assessment (DMA) initiated in 2024 and ongoing in 2025, we identified and evaluated climate-related impacts, risks, and opportunities in accordance with ESRS E1. The assessment considers both impact materiality (our impacts on climate change) and financial materiality (the effects of climate change on our business model, strategy, and financial performance).

Our activities contribute to climate change by generating greenhouse gases (GHG) primarily through the use of fossil fuels in logistics and energy consumption in our operations and supply chain. We support the climate transition through mitigation efforts, including energy efficiency, investments in renewable energy, and supplier engagement.

From the financial materiality perspective, we face both physical risks (e.g., extreme weather events affecting supply chain) and transition risks (e.g., regulatory changes impacting business operations). To address these challenges, we are implementing measures to strengthen our resilience and support the climate transition. This includes diversifying our suppliers, investing in energy transition, and integrating climate risks into our operational planning.

Resilience analysis

The assessment of climate-related impacts, risks, and opportunities (IROs) within the double materiality forms the foundation for a detailed resilience analysis.

Future climate resilience assessments will incorporate **short-term** (2025-2030), **medium-term** (2030-2040), and **long-term** (2040-2050) perspectives to ensure a comprehensive evaluation of evolving risks and adaptation strategies.

CLIMATE TRANSITION PLAN

E1-1 Transition plan for climate change mitigation

We have developed a climate transition plan aligned with the Science Based Targets initiative (SBTi). Key strategies include improving energy efficiency, expanding renewable energy use, growing a low-emission vehicle fleet, and engaging suppliers to commit to SBTi. The transition plan prioritises decarbonising fleets and facilities.

Our decarbonisation strategy aligns with a 1.5°C trajectory, as validated by the SBTi. Our targets include a 50% absolute reduction in Scope 1 and 2 emissions by 2030 from a 2019 base year, following the Absolute Contraction approach. This ambition exceeds the minimum requirement for a 1.5°C pathway.

Additionally, to address Scope 3 emissions, we commit to ensuring that 76% of our suppliers by emissions, including those involved inpurchasing goods and services as well as upstream transportation and distribution, establish science-based targets by 2026.

Decarbonisation levers

Our decarbonisation strategy was developed in 2024 as part of our ongoing commitment to reducing our carbon footprint and transitioning to a low-carbon economy. This strategy outlines key actions and milestones for achieving significant emissions reductions across our operations, including a clear decarbonisation pathway with specific levers to be implemented across energy transition, energy efficiency, logistics and fleet management, and carbon offset initiatives.

The pathway guides our efforts to achieve SBTi's reduction target and will be incorporated into our future sustainability reports, ensuring that we track and report progress towards our climate goals.

The key levers are aligned with our ambition to reduce greenhouse gas emissions across Scope 1, 2, and 3:

Scope 1

One of the primary levers for Scope 1 decarbonisation is the electrification of our vehicle fleet, with a focus on last-mile delivery and sales representatives. In 2024, we expanded the use of electric vehicles (EVs), including vans, in countries such as Poland, France, Germany, and CASH (Czech Republic, Austria, Slovakia, Hungary) , with the aim of gradually phasing out internal combustion engine vehicles. Additionally, internal programmes focusing on fuel efficiency and route optimisation further contribute to reducing direct emissions.

Scope 2

To address Scope 2 emissions, we are investing in renewable energy procurement and energy efficiency upgrades. As from 2024, we have begun using solar panels in Thailand and CASH facilities, contributing to on-site clean electricity generation. Across multiple sites, energy efficiency measures, including LED lighting and energy management systems, are being implemented to lower overall electricity consumption and improve building performance.

Scope 3

Scope 3 emission reductions rely on strategic collaboration with partners and suppliers. Our supplier engagement programme aims to raise awareness, encourage disclosure of emissions data, and promote science-based target setting among key suppliers. In parallel, we are advancing circular economy initiatives, such as expanding reuse, repair, and recycling service models, to reduce downstream emissions and support sustainable customer behaviours.

Together, these decarbonisation levers form the foundation of our climate strategy, driving measurable progress towards our long-term emission reduction targets. Our ambition and approach align with our commitments to SDG 13 Climate Action and SDG 17 Partnerships for the Goals.

Embedded in strategy

The climate transition plan is embedded in our strategy and funded through our annual business and financial planning process, which is approved by our Executive Board and our Board of Directors. The Group chief sustainability officer is responsible for ensuring that ESG strategy, including the climate transition plan, is implemented.

We integrate performance measures related to GHG emissions reductions in our management incentive schemes (see disclosure requirement ESRS 2 GOV-3 in the General disclosures section). Lyreco Group is not excluded from Paris aligned benchmarks.

In 2024, we incorporated climate-related performance criteria into the remuneration of our senior leadership. This includes key performance indicators (KPIs) linked to greenhouse gas reduction targets. Moreover, climate-related performance is increasingly being integrated into the variable remuneration of our administrative, management, and supervisory bodies to reinforce accountability and alignment with our sustainability objectives.

GHG emissions accounting

Our calculation methodology aligns with the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard. We use updated emissions factors from sources such as DEFRA and Exiobase, with adjustments for regional variations. Key assumptions include the use of average emission factors for specific energy sources and adjustments for regional variations in emission factors.

In 2024, there were no significant changes to the definition of the reporting undertaken or its value chain that would affect the comparability of reported GHG emissions year over year. The scope and boundaries of our GHG emissions reporting remain consistent with the approach outlined in our GHG Methodology, as verified and confirmed by SGS (see the assurance statement on our website).

Scope 3 GHG emissions categories

For the 2024 reporting period, we have included the following Scope 3 GHG emissions categories in our inventory:

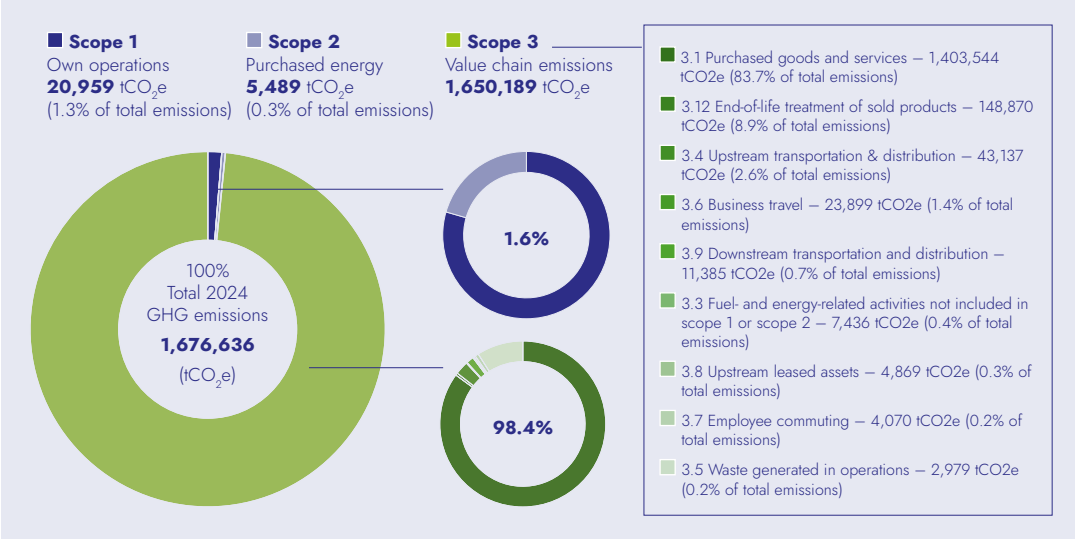
1. Category 1 - Purchased goods and services.
2. Category 2 - Capital goods.
3. Category 3 - Fueland energy-related activities.
4. Category 4 - Upstream transportation and distribution.
5. Category 5 - Waste generated in operations.
6. Category 6 - Business travel.
7. Category 7 - Employee commuting.
8. Category 8 - Upstream leased assets.
9. Category 9 - Downstream transportation and distribution.
10. Category 12 - End-of-life treatment of sold products.
11. Category 15 - Investments.

Scope 3 categories have only been excluded when assessed as not relevant to our operations or immaterial to our overall GHG profile. This assessment follows recognised standards and is reviewed regularly. Categories 10 (processing of sold products), 11 (use of sold products), 13 (downstream leased assets), and 14 (franchises) were excluded based on data availability, negligible impact, or non-applicability.

Our Scope 3 GHG emissions are calculated using the financial control approach, which means we include emissions from entities and activities over which we have financial control, regardless of operational control.

Emissions are estimated across relevant categories such as purchased goods and services, upstream and downstream transportation, business travel, and waste. Where possible, we use primary data from our suppliers; otherwise, we apply recognised secondary data, industry benchmarks, and appropriate emission factors.

Emission data (1 january - 31 december 2024)



Climate-related impacts, risks and opportunities

Disclosure requirement related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with our strategy and business model.

Climate change impacts

The double materiality assessment carried out under ESRS IRO-2 identified the following three negative environmental impacts related to climate change and energy use across our operations and value chain:

GHG emissions from wood- and paper-based products
A substantial share of our product portfolio, around 40%, consists of wood- and paper-based goods. Unsustainable sourcing of these materials can lead to deforestation and land-use change, reducing natural carbon sinks and increasing greenhouse gas emissions. This impact occurs upstream in the value chain and contributes to climate change over the short, medium or long term. Its consequences are both local and global. We mitigate this impact by prioritising certified sustainable products (FSC, PEFC) and promoting alternatives with lower carbon footprints, such as recycled or circular products. We also work with suppliers to support sustainable practices.

GHG emissions from energy use in Lyreco's operations
We operate facilities in several countries, including Poland, Hungary, the Czech Republic, and Slovakia, where the electricity grid is predominantly powered by fossil fuels, especially coal. As a result, purchased electricity is carbon intensive, contributing to Scope 2 emissions. This negative impact occurs in our own operations and affects the climate over the short and medium term. We are reducing this impact by investing in renewable energy at our own sites (e.g., solar panel installations), increasing the purchase of renewable electricity certificates (RECs/REGOs), and collaborating with landlords in leased facilities

to transition towards low-carbon energy sources.

GHG emissions from supplier production and manufacturing
Many of our suppliers operate in energy-intensive industries and rely on fossil fuels for production processes. This leads to significant upstream Scope 3 emissions, contributing to climate change and environmental degradation. This negative impact is systemic to the supply chain and affects the climate in the short, medium or long term. We address this impact through active supplier engagement focused on emissions reduction and energy efficiency. Sustainability criteria are embedded in our procurement process, including energy-related assessments and re-tendering practices that support a shift towards lower-carbon production methods.

Climate change risks and opportunities

We are aware and recognize the impact of climate change on our operations and are committed to addressing associated risks and seizing opportunities. Our risks primarily stem from climate-related physical events (such as extreme weather events impacting supply chain), transition risks related to regulatory changes (such as plastic sourcing regulations and energy costs), and market shifts due to rising customer demand for sustainable products.

In response, we are focused on strengthening the resilience of our supply chain, investing in renewable energy, and diversifying our product portfolio to meet growing sustainability demands. These actions are considered as part of our strategy and annual business planning process and are outlined in E1-3.

As a result of these actions, we expect to continue to be able to decarbonise our products and services within our existing business model while continuing to secure access to finance at an affordable cost of capital and without the need to reskill our workforce.

ESRS E1 Climate Change			Value chain connection			Time horizon		
Materiality category	**Attached to**	**IRO type**	**Upstream**	**Own operations**	**Downstream**	**Short term**	**Medium term**	**Long term**
Risk	E1a - Climate change adaptation	Temperature-related - Climate-related physical acute risk	X				X	
Risk	E1a - Climate change adaptation	Policy and Legal - Climate-related transition risk	X	X			X	
Actual negative impact	E1b - Climate change mitigation - own GHG emissions reductions	Environment - OECD RBC (ch VI.)	X	X			X	
Opportunity	E1c - Climate change mitigation - low carbon offering	Business opportunity		X			X	
Actual negative impact	E1d - Energy efficiency	Environment - OECD RBC (ch VI.)	X	X		X	X	X
Risk	E1d - Energy efficiency	Market - Climate-related transition risk	X	X	X		X	

ESRS E1 Climate Change			Value chain connection			Time horizon		
Materiality category	Attached to	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
Risk	E1d - Energy efficiency	Market - Climate-related transition risk		X	X			X

Impact, risk and opportunity management

E1-2 Policies related to climate change mitigation and adaptation

We have an internal sustainability policy in place that addresses key environmental topics, including the reduction of greenhouse gas emissions and our commitment to circular economy practices. This policy, is binding for all Lyreco Group employees and defines how we address our environmental performance and climate change mitigation by including our commitment to reducing Scope 1, 2 and 3 emissions in line with SBTi targets. By covering all emissions scopes, our sustainability policy applies to emissions from our own operations, as well as our upstream and downstream value chain.

The policy is distributed through the Group's policy management system on the intranet, and training for policy adherence is available for all employees. The Group sustainability director has overall responsibility for the policy, while the regional managing directors are responsible for implementing it in their countries as heads of their respective legal entities.

E1-3 Actions and resources in relation to climate change policies

Delivering goods is our core business model. We are continuously working to reduce our CO2 equivalent (CO2e) impact thanks to delivery optimisation and alternative low-emission deliveries. By 2026, we aim to significantly reduce the environmental impact of our company vehicles.

In addition, we take action to reduce the environmental impact of our business travel practices and by 2026, our ambition is to have our own company facilities 100% supplied by renewable electricity. The emissions that we cannot reduce in these categories will be offset by financing climate action.

E1 Climate change - Local initiatives

Each Lyreco country plays a vital role in delivering our decarbonisation roadmap by implementing tailored actions adapted to local realities. These country-led initiatives contribute meaningfully to our global emission reduction targets through renewable energy investments, sustainable logistics, employee engagement, and circular economy practices.

Iberia: Carbon footprint reporting for customers

Lyreco Iberia has enhanced its Power BI-based customer reporting tool to display order-related carbon footprint data with improved accuracy and usability. Sales teams were trained to explain these reports, which are available to customers "in one click" as a PDF. The report

shows CO2 equivalent emissions, highlights savings when orders are grouped, and translates emissions into an equivalent number of trees required for offsetting. In 2024, the report was further refined to include source references and a clear methodology, enabling customers to integrate the data into their own Scope 3 reporting.

Norway: Environmental reporting with Mybring

Lyreco Norway leverages Mybring's digital environmental reporting platform to provide customers with detailed insights into their shipment-related greenhouse gas emissions. This tool enhances transparency and supports sustainability requirements, particularly in public sector procurement tenders.

Sweden: 50/5 Climate Pledge

Lyreco Sweden has committed to halving the climate impact of its customers within five years through the "50/5 Climate Pledge." This ambitious initiative focuses on offering climate-friendly products, optimising transportation, and implementing circular solutions. Key actions include mapping the climate impact of all 45,000 products, collaborating with PostNord for efficient logistics, and partnering with organisations such as Sysav and Human Bridge to recycle textiles and promote circularity.

Italy: Electric delivery fleet

Lyreco Italy continues to expand its 100% electric delivery fleet with four new vehicles, including the CENNTRO, a compact electric van specifically designed for navigating narrow city streets, such as those in Genoa. This investment not only reduces emissions but also enhances last-mile delivery capabilities, ensuring efficient and sustainable service for all customers.

France: Low-emission urban deliveries

Through a partnership with Fludis, Lyreco France delivers 50% of its Parisian orders using an electric barge on the Seine and electric cargo bikes. This innovative last-mile solution reduces CO2 emissions, eliminates urban truck traffic, and inspires our partners to explore similar sustainable logistics.

UK & Ireland: Large-scale solar PV investment

The UK & Ireland operations significantly reduced emissions through the installation of 13,860 solar photovoltaic (PV) panels—one of the largest rooftop PV systems in the region. The system generates approximately three million kWh annually, exceeding local energy needs, with around 50% exported to the grid. Any electricity purchased is 100% REGO-certified renewable.

Central Europe: Solar panels

In 2024, Central Europe completed its first full year of photovoltaic panel operation, generating nearly 188 MWh. Of this, 162 MWh was consumed internally across its head office and distribution centre, covering 29% of total electricity use. The remainder was exported to the grid. Using an emission factor of 0.00014067 tCO2e/kWh, the solar installation helped reduce CO2 emissions by approximately 23 tCO2e.

Korea: LyrECO WEEK sustainability campaign

In June 2024, the Korea Sustainability and P&C teams launched the "LyrECO WEEK" campaign to engage employees in simple, impactful sustainability actions. Weekly missions

included writing eco-themed poems, planting air-purifying plants, sharing unused office supplies, and reducing disposable cup use. The campaign culminated in an "Eco Day" volunteer activity, where employees helped remove invasive plant species along the Yangjae Stream in Seoul.

Sustainable Selection

At Lyreco, our aim is to use and sell more products and services that contribute to the planet and its population. We strive to do so by strengthening our practices and working hand in hand with our suppliers and external partners who share our concerns and ambitions.

Our pioneering goal is to make it easier for our customers to make sustainable choices with confidence. In 2023, we launched the Lyreco Sustainable Selection, a methodology for identifying suppliers and products with better sustainability-related performance.

In 2024, Sustainable Selection was reassessed by SGS based on the ISO 20400:2017 principles.

Lyreco Sustainable Selection is continuously improving to meet ever-changing needs and requirements and increase our sustainability maturity level.

This assessment methodology is carried out in two successive steps among which three mandatory criteria are required from our suppliers and products to pass the overall assessment:

Step 1: Supplier assessment

Step 2: Product assessment

If the two mandatory criteria are met, the products will be further assessed and assigned up to three of the following **Sustainable Selection** icons:

Planet: Products focusing on environmental contribution.

People at Work: Products contributing to the well-being and safety of people at work.

Community: Products contributing to improving societal impact on local communities.

Sustainable Procurement KPI

KPI name	2022	2023	2024
Number of Group buyers trained on sustainable procurement	10	9	12
Percentage of Group buyers trained on sustainable procurement	100%	100%	100%
Percentage of Group suppliers that have gone through a sustainability assessment	92%	94%	93%
Percentage of Group suppliers that have signed or acknowledged the Supplier Code of Ethics	82%	100%	95%
Percentage of Group suppliers with contracts that include clauses on environmental and social aspects	NA	100%	77%
Percentage of revenue from products in 'Sustainable Selection'	36%*	47%	57%

* Since we launched our new Sustainable Selection assessment methodology in 2023, we do not have historical sales data. This number considers Green Tree sales share.

TARGETS AND METRICS

E1-4 Targets related to climate change mitigation and adaptation

We monitor the effectiveness of our climate-related policies and actions through the systematic tracking of progress against defined targets. This includes both quantitative and qualitative targets related to greenhouse gas emissions, product sustainability, energy efficiency, and the transition to renewable energy, as well as emerging targets in climate risk management and adaptation planning.

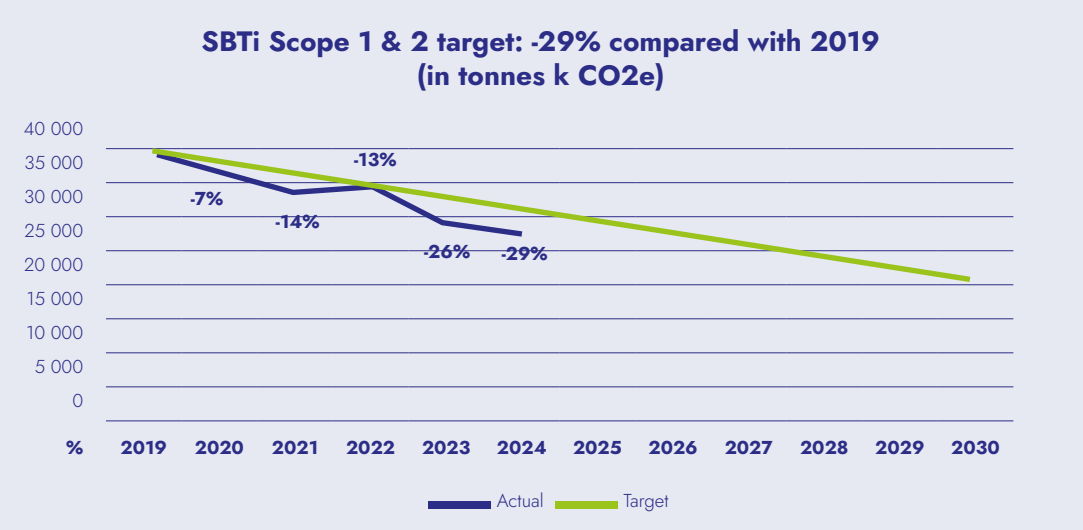
SCIENCE BASED TARGETS

Our greenhouse gas emissions reduction target has been validated by the Science Based Targets initiative (SBTi) in 2023 and is fully aligned with the 1.5°C trajectory set forth in the Paris Agreement.

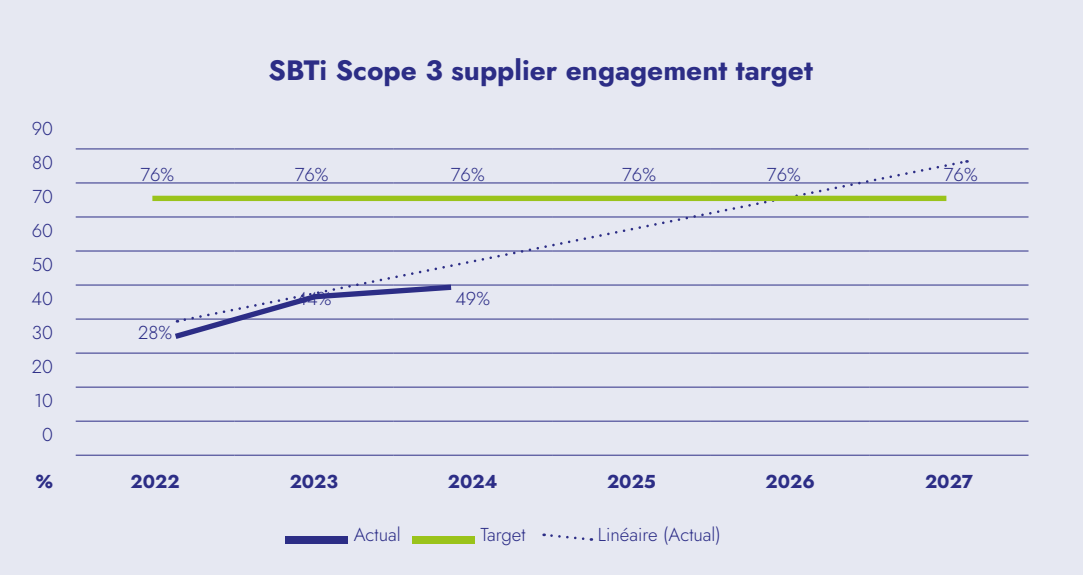
By committing to this level of ambition, we are taking credible, science-based action to limit our contribution to global warming and help mitigate the most severe impacts of climate change. This target encompasses our Scope 1 and Scope 2 emissions, reflecting our commitment to reducing our operational climate impact, managing transition risks, and positioning the company for long-term resilience and sustainable growth in a low-carbon economy.

The SBTi target is: "Lyreco commits to reduce absolute scope 1 and 2 GHG emissions 50% by 2030 from a 2019 base year. Lyreco also commits that 76% of its suppliers by emissions covering purchased goods and services and upstream transportation and distribution, will have science-based targets by 2026."

In 2024 we achieved 29% reduction in Scope 1 and 2 comparing to 2019 baseline.



In 2024 we achieved 49% of supplier engagement target, comparing to 2019 baseline.



The consistency between our GHG emission reduction targets and our GHG inventory boundaries has been ensured through a clearly defined boundary-setting approach detailed in our GHG Methodology.

The methodology specifies that we apply the financial control approach, aligned with the GHG Protocol for Scopes 1, 2, and relevant Scope 3 categories. This ensures full alignment between the emissions included in the inventory and those covered by the reduction targets.

Target baseline year

Our current GHG reduction targets are based on a 2019 baseline, which at the time reflected typical business activities and a stable operational context. Since submitting our two science-based targets in 2022, we have undertaken significant acquisitions and made improvements to the accuracy of our emissions data. These events trigger the requirement under the SBTi's Target Validation Protocol to retroactively recalculate our base-year emissions to ensure consistency.

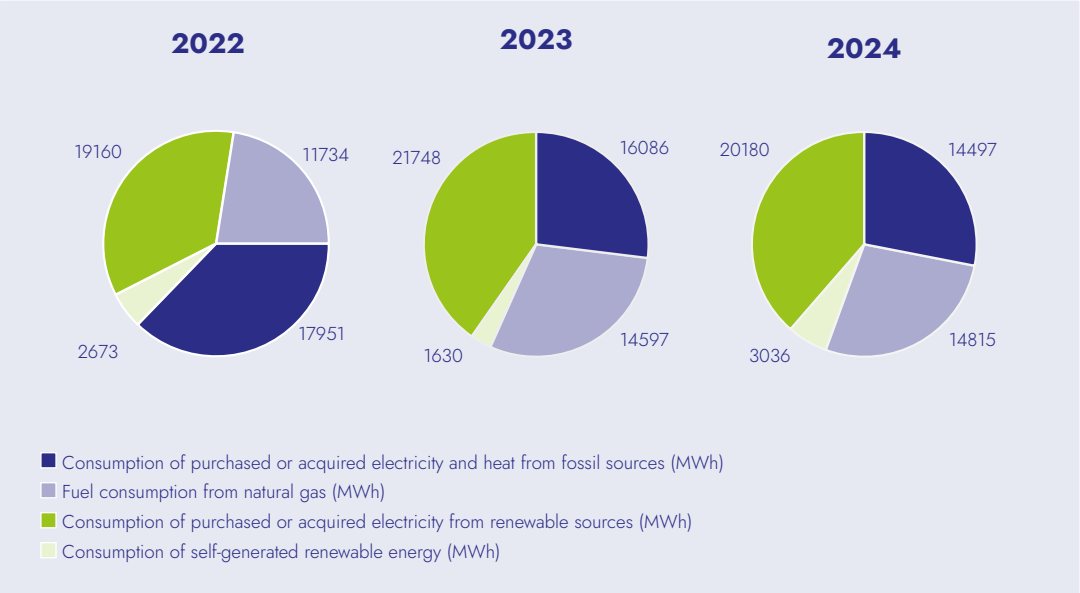
As a result, in line with ESRS and SBTi requirements to review and update the baseline every five years, we are considering a revision in the next years. This aligns with our plan to set a net-zero target and ensure both consistency and comparability going forward. Any change to the baseline year will be clearly documented, including adjustments to historical data, changes in activity coverage, and underlying assumptions.

Over the past years, Lyreco have significantly improved the maturity of the GHG emissions calculations. During this process, we identified discrepancies in our historical GHG inventory in relation to the GHG Protocol requirements. These included changes in emission scopes and the emission factors applied. As a result, we recalculated our 2019 baseline to align with the current methodology. To further enhance the robustness of our GHG accounting, our 2023 and 2024 inventories were verified by an external party. This helped us correct the identified inconsistencies and improve data quality. For this reason, previously published figures for 2019 baseline differ from those presented in this report.

E1-5 Energy consumption and mix

Our energy consumption primarily includes electricity, gas heating, and district heating, depending on the facility type and its location. To reduce our reliance on non-renewable energy sources, we are actively working to decarbonise our energy mix in line with our Scope 2 science-based target. This includes initiatives such as entering into corporate power purchase agreements (PPAs) for renewable electricity, installing solar panels on our sites, and implementing energy efficiency measures.

Energy intensity is monitored and calculated with a focus on high-impact sectors, such as transport and logistics, warehousing and storage, packaging operations, and IT infrastructure. These sectors represent a significant share of our total energy use and greenhouse gas emissions. Regular monitoring enables us to identify opportunities for improvement and track progress toward our energy and emissions reduction goals.



Energy consumption and mix	2022	2023	2024
Fuel consumption from coal and coal products	not applicable	not applicable	not applicable
Fuel consumption from crude oil and petroleum products	90,913.22	86,588.62	78528.6
Fuel consumption from natural gas [MWh]	11,733.80	14,597.44	14,814.77
Fuel consumption from other fossil sources	not applicable	not applicable	not applicable
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	17,951.01	16086.27	14496.55
Total energy consumption from fossil sources	**120598.03**	**117272.33**	**107839.92**
Percentage of fossil sources in total energy consumption	85%	83.4%	82.3%
Total energy consumption from nuclear sources	not available	not available	not available
Percentage of energy consumption from nuclear sources in total energy consumption	not available	not available	not available
Fuel consumption from renewable sources	not available	not available	not available
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	19,160.24	21,748.11	20,180.45
Consumption of self-generated non-fuel renewable energy	2,672.90	1,630.30	3,035.60
Total energy consumption from renewable sources	**21833.14**	**23378.41**	**23216.05**
Percentage of renewable sources in total energy consumption	15%	16.6%	17.7%
Percentage of renewable sources in total electricity consumption	122%	59.2%	61.6%
Total energy consumption	**142,431.17**	**140,650.74**	**131,055.97**

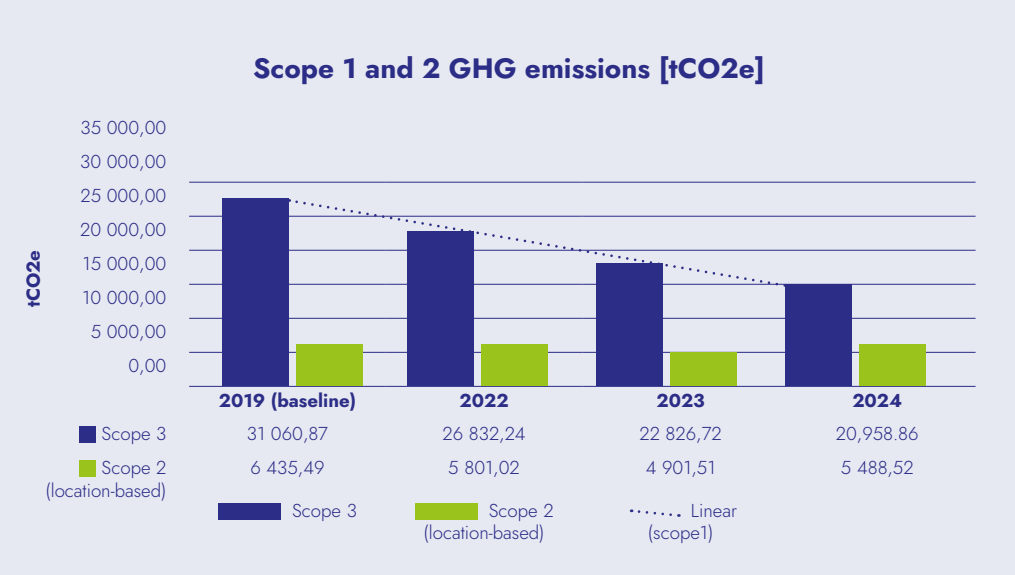
GHG EMISSIONS

E1-6 Gross Scopes 1, 2, 3 and total GHG emissions

The methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions are provided in the GHG accounting section on page 34.

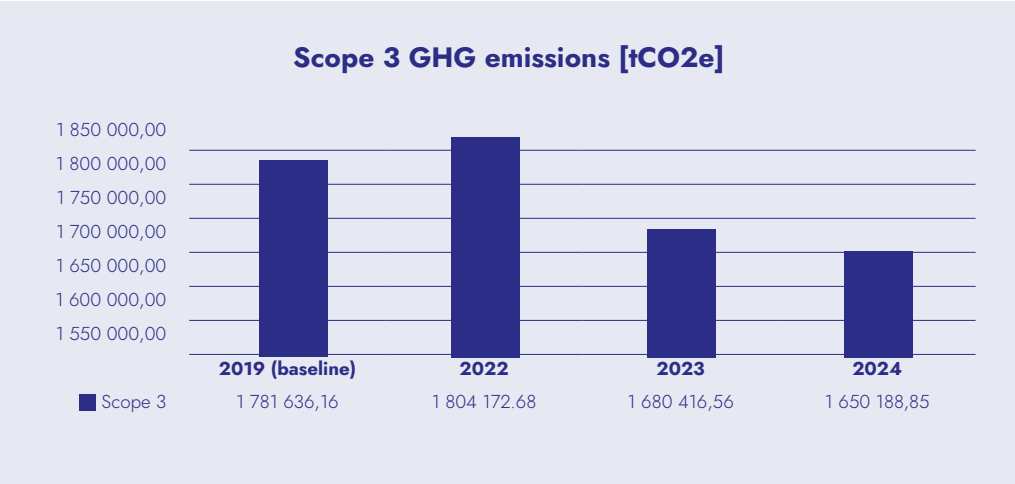
Scope 1 and 2

Our absolute Scope 1 emissions have decreased by 8.2% from 2023 to 2024, and our Scope 2 emissions have increased by 12% during the same period. The decrease in Scope 1 is largely due to the implementation of decarbonisation levers across our subsidiaries related to the fleet electrification. As we are using more electricity, our Scope 2 emissions slightly increased. We are committed to reducing our absolute emissions from Scope 1 and 2 and will continue to invest in power purchase agreements (PPAs), energy management systems, decarbonising our vehicles, and other CO2e-reducing initiatives in our offices and warehouses.



Scope 3

As shown in the below Scope 3 GHG emissions graph, our total Scope 3 GHG emissions have decreased by 7.4% due to our efforts to engage our upstream value chain. As Scope 3 emissions represent 98.4% of our total emissions, a large decrease will collectively result in an overall decrease in our total emissions.



	Scope 1	Scope 2 (location-based)	Scope 2 (market-based)	Total (Scope 1&2)	Scope 3	Total (all scopes)
2019 (baseline)	31,060.87	6,435.49	NA	37,496.36	1,781,636.16	1,819,132.52
2024	21,275.12	5,488.52	3,418.71	26,764.27	1,650,188.85	1,676,953.12
Absolute reduction from 2019 baseline (tCO2e)	-9,785.12	-946.97	NA	-10,732.09	-131,447.31	-142,179.40
% of reduction from 2019 baseline	-31.5%	-14.7%	NA	-28.6%	-7.4%	-7.8%

Calculation of GHG emissions intensity

We reconcile the net revenue used for the calculation of our GHG emissions intensity by cross-referencing the relevant financial data presented in our general purpose financial statements. This ensures that our reported emissions intensity aligns with the financial performance of the company, maintaining clarity and accountability in both financial and environmental reporting.

GHG emissions intensity

KPI ID	KPI name	Unit	2022	2023	2024
-	Total GHG emissions (location-based) per net revenue	t CO_2e/€	0.6533	0.5726	0.5757
E1-4_05	Intensity value of total Greenhouse gas emissions reduction	kg CO_2e/€	0.01	-0.04	-0.05
E1-4_08	Intensity value of Scope 1 Greenhouse gas emissions reduction	kg CO_2e/€	-0.0015	-0.0028	-0.0034
E1-4_11	Intensity value of local-based Scope 2 GHG gas emissions reduction	kg CO_2e/€	-0.0002	-0.0005	-0.0003
E1-4_17	Intensity value of local-based Scope 3 Greenhouse gas emissions reduction	kg CO_2e/€	0.0082	-0.0339	-0.0451

E1-7 GHG removals and GHG mitigation projects financed through carbon credits

In 2024, we supported climate change mitigation projects beyond our value chain, including forest restoration and renewable energy initiatives, financed through the purchase of carbon credits. These projects aim to reduce GHG emissions or remove CO2 from the atmosphere, contributing to our broader climate goals. Our carbon credit purchases are verified through third-party standards such as VCS and Gold Standard.

Our corporate goal is to ensure that all emissions resulting from our business travel practices, that cannot be reduced through direct actions, will have their emissions eliminated through carbon removal projects by financing climate action initiatives.

Use and quality criteria for carbon credits

We use high-quality carbon credits from projects certified by reputable third-party standards, such as VCS, Gold Standard, CCBS, CDM, ACR, Plan Vivo, and CAR. These certifications ensure the credibility and effectiveness of the emission reductions.

Our selected offset projects must:

Align with SDG 13 and our SBTi targets
Be third-party verified and long-term sustainable
Focus on permanent emission reductions, not displacement
Support ecosystem restoration and long-term carbon storage
Include carbon removal and uphold social integrity
Be co-designed with local communities and manage reversal risks

To address the portion of our 2024 greenhouse gas emissions that could not be reduced, we supported two certified offsetting projects: a 30-year reforestation initiative in France under the Label Bas-Carbone scheme, and a wind power project in South Korea accredited under the Clean Development Mechanism (CDM). These initiatives contribute to verified emissions reductions and reflect our commitment to climate responsibility while we continue to work on reducing our overall emissions.

GHG removals and storage

We are currently in the exploratory phase, assessing available options and frameworks for credible GHG removals and storage, including nature-based and technology-based solutions. This includes evaluating methodologies such as those recommended by the IPCC and recognised voluntary carbon market standards.

E1-8 Internal carbon pricing

Internal carbon pricing schemes are not implemented in our business.

E1-9 Anticipated financial effects from material, physical and transition risks and potential climate-related opportunities

We have opted to exercise the phase-in allowance to omit the financial effects from material, physical and transition risks and potential climate-related opportunities required in E1-9.

Circular Economy Pledge

Although our 2024 sustainability statement does not include disclosures on ESRS E5, Resource use and circular economy, we would like to share progress on one of our key commitments related to circular solutions.

From 2020 to 2025, we committed to making circular economy a key driver of sustainable business solutions for our customers. Our Circular Economy pledge supports both our sustainability goals and growing customer demand for circular, resource-efficient products and services.

Despite a fast-changing regulatory and business environment from 2020 to 2024, we have made strong progress in executing the Circular Economy pledge, thanks to both Sustainable Selection and local initiatives

In 2024, we notably expanded:

Recycle-ready product offerings, with 90% of product families featuring at least one item meeting Sustainable Selection criteria for recyclability, refurbished products, compostability and/or degradability.

End-of-life solutions, partnering with over 40 organisations across Europe to collect and recycle diverse materials including writing instruments, batteries, WEEE, PPE, and more.

Circular packaging, with 67% of products featuring recycle-ready packaging.

Single-Use Plastics regulation compliance, eliminating single-use plastics in our facilities.

Circular economy standard for the workplace industry, assessing 94% of Group suppliers against our sustainability standard including circularity criteria.

Our efforts were recognised with the Sustainability Excellence – Reseller Award at the 2024 European Office Products Awards, reinforcing our ongoing efforts in sustainable innovation and highlighting our role in advancing sustainability in the workplace sector.

Additional environmental data - waste

Waste type	Treatment type	Hazardous waste (tonnes)	Non-hazardous waste (tonnes)	Total (tonnes)
Total waste generated	All	235.36	10 721.17	10 956.53
Waste diverted from disposal	Preparation for reuse	68.96	0	911.85
	Recycling	0	842.89	
	Other recovery operations	0	0	
Waste directed to disposal	Incineration	57.58	1 113.96	10 044.67
	Landfill	4.854	980.2	
	Other disposal operations	103.96	7 784.13	

PEOPLE: SOCIAL INFORMATION

Lyreco

ESRS S1 OWN WORFORCE

Our employees are at the heart of everything we do. They empower us to lead the way and create a great working day through our products, services, and tailored, professional advice.

That's why we strive to provide our teams, wherever they work, whatever their mission is, with the best possible work experience in a safe, ethical and inclusive environment.

Respect for people and for the planet is one of our four core values which guide and inspire our people and serve as the basis for every decision we make.

We are committed to fostering a workplace where all employees feel valued, safe, and empowered to grow. Our approach centres on:

- Providing meaningful work and career development opportunities,
- Building a diverse, inclusive culture where everyone can thrive, and
- Ensuring the health, safety, and well-being of our people across all operations.

This disclosure covers all materially affected members of Lyreco's own workforce, including full-time and part-time employees across our global operations.

IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WORKING CONDITIONS AND WORK RELATED RIGHTS

ESRS 2 – SBM-3

S1 Material impacts, risks and opportunities and their interaction with strategy and business model

Lyreco is committed to ensuring our employees feel valued for the work they do. This means providing favourable employment conditions for employees, including competitive compensation packages, flexible working for office employees, and secure employment.

ESRS S1 Own workforce			Value chain connection			Time horizon		
Materiality category	**Sub-topic**	**IRO type**	**Upstream**	**Own operations**	**Downstream**	**Short term**	**Medium term**	**Long term**
Potential positive impact	S1a1 - Secure employment	Positive impact on people		x			x	
Potential negative impact	S1a1 - Secure employment	Employment and Industrial Relations - OECD RBC (ch V.)		x			x	
Risk	S1a3 - Adequate wages	Operations are not run efficiently		x			x	
Risk	S1a7 - Work-life balance	Operations are not run efficiently		x				x
Potential negative impact	S1a8 - Health and safety	Employment and Industrial Relations - OECD RBC (ch V.)		x		x		
Risk	S1a8 - Health and safety	Regulatory risk		x		x		
Potential positive impact	S1b2 - Training and skills development	Positive impact on people		x				x
Risk	S1b4 - Measures against violence and harassment in the workplace	Regulatory risk		x			x	
Negative impact	S1c4 - Privacy	Negative impact on people		x			x	
Risk	S1c4 - Privacy	Regulatory risk		x			x	

Own workforce impacts

Our materiality assessment identified the following potential impacts on our workforce:

Internal mobility and career development

By promoting internal mobility and structured career growth, Lyreco enhances job security, employee satisfaction, and retention. Targeted training and development opportunities support skill-building and long-term employment, contributing to a more engaged and resilient workforce.

Employment of contractors/temporary workers

Although contractors and temporary workers are an essential part of our operational flexibility, their employment may involve higher risks for human rights impacts. These include lower access to benefits, limited job security, and reduced protection compared to permanent staff. The impact is particularly relevant in countries with weaker labour protections or where temporary workers are used extensively in logistics and warehousing. The Group provides long-term contracts and competitive benefits to ensure job security.

Absence of living wage assessments and gender pay gap analysis across all subsidiaries
As of 2024, not all our subsidiaries conduct living wage assessments or gender pay gap analyses, and consolidated data at Group level is lacking. This may result in wages that do not ensure a decent standard of living and may perpetuate gender-based income inequalities. To address it, we plan to implement a Group-wide process for conducting these assessments and for collecting harmonised data across all subsidiaries in 2026.

Health and safety
Workplace hazards—including physical, chemical, ergonomic, and psychological risks—can lead to significant health and safety concerns for employees, particularly in logistics, warehousing, and transport activities. These roles involve higher exposure to manual handling, vehicle operations, repetitive tasks, and high-paced environments. If not properly managed, such risks may result in accidents, occupational illnesses, or long-term health issues.

Own workforce risks and opportunities

Wage structures in the workforce
Lack of living wage assessments and gender pay gap analysis may lead to dissatisfaction, higher turnover, and reduced productivity. We are working to strengthen our wage transparency and assessment tools across all entities.

Work-life imbalance affecting employee wellbeing
Insufficient work-life balance can increase stress, burnout, and attrition. We mitigate this through wellbeing initiatives, flexible work options, and promoting a healthy work culture.

Occupational health and safety incidents in the workplace
Workplace incidents may lead to fines, compensation claims, and reputational damage. We focus on prevention through health & safety training, awareness campaigns, and local action plans.

Workplace harassment and misconduct
Failure to prevent workplace harassment may result in legal issues and loss of employee trust. We enforce anti-harassment policies, training, and a secure reporting system.

Management of employee personal data
Non-compliance with GDPR could lead to fines and loss of trust. We ensure strong privacy controls, staff awareness, and full Group-wide GDPR compliance.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

S1-1 Policies related to own workforce

Ethical Standards and Respect for Human Rights

Our approach to working conditions is governed by our Code of Ethics, which sets clear transparency standards covering all aspects of our operations and daily work. The Code of Ethics integrates core principles that reflect our strong commitment to human rights, including labour rights, fair working conditions, and non-discrimination. These principles are aligned with internationally recognised norms and standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Core Labour Standards.

Although we do not have a standalone human rights policy, the Code of Ethics, together with relevant internal procedures, acts as a cornerstone of our human rights commitments, guiding employee conduct and management practices across all our subsidiaries.

We are committed to respecting labour rights, including the freedom of association, the right to collective bargaining, the elimination of forced and child labour, and ensuring safe and healthy working conditions.

Workforce-Related Policy Framework

No significant changes to workforce-related policies were made during the reporting year 2024. Our existing policies remain in effect and are subject to regular review.

Our policies explicitly address human trafficking, forced or compulsory labour, and child labour. These provisions also extend to our supply chain via our Supplier Code of Ethics and due diligence processes (see "Statement on due diligence", p. 15).

Workforce-related policies are operationalised through various procedures and programmes and communicated through internal channels such as onboarding sessions, e-learnings, employee handbooks, intranet, internal campaigns, and team meetings.

Engagement, grievance mechanisms and remedies

Lyreco proactively engages with employees through regular surveys, performance reviews, and wellbeing assessments. Local People & Culture (P&C) teams and employee representatives foster structured two-way dialogue.

Grievance mechanisms include:

- Access to P&C representatives and direct managers.
- A confidential whistleblowing tool, Raise Your Concern, operated by Group Compliance.
- Local Ethics Referents, usually senior leaders (Finance or P&C Directors), supporting ethical conduct in each country.

We also remain alert to informal or cultural barriers that may hinder employees from raising concerns and actively promote an inclusive environment that fosters psychological safety.

While no major human rights violations have been identified, these procedures ensure that any potential issues are addressed promptly and fairly, with corrective actions implemented where needed.

Diversity, Inclusion and Non-Discrimination

Lyreco's Equality and Diversity Policy aims to eliminate discrimination based on gender, age, race, ethnicity, religion or belief, sexual orientation, disability, and other protected characteristics. Specific commitments are in place to promote inclusion of vulnerable groups, including persons with disabilities or minority backgrounds, supported by awareness campaigns and inclusive hiring practices.

Responsibility for these matters lies at the top management level, including the Chief People & Culture Officer, with local execution by country P&C Managers.

Fair Employment Practices and Equal Opportunity

Our HR procedures ensure that qualifications, skills, and experience are the basis for recruitment, placement, and promotion decisions. We apply structured and standardised job descriptions and interview procedures to reduce bias.

Lyreco maintains up-to-date records on recruitment, internal mobility, promotions, and training through our global HR system, Workday. These KPIs are tracked by local P&C Directors to support transparency in career progression. Although training tracking varies by country, a new Learning Management System (LMS) is being selected to improve data consistency.

Access to Skills Development

We invest in structured skills development programmes tailored to evolving business and employee needs. This approach ensures that all employees, regardless of role or level, have access to learning and growth opportunities that align with our strategic workforce goals.

CREATING A MEANINGFUL WORKPLACE

S1-2 Processes for engaging with own workforce and workers' representatives about impacts

Workforce engagement mechanisms

We actively engage our employees to understand and manage actual and potential impacts on them. We measure our progress by monitoring outcomes for our employees through our annual employee survey, the Great People Survey (GPS). The GPS gathers feedback on how meaningful our employees find their work at Lyreco Group and spans areas including job satisfaction, wellbeing, pay and rewards, diversity and inclusion, and learning and development.

In addition to the GPS, we maintain regular, structured engagement with employees via formal mechanisms such as the European Works Council (EWC) and local works councils where legally required. In countries without formal representation, alternative forms of engagement such as employee forums or direct consultation ensure workforce voices are still captured.

The Chief People & Culture Officer is responsible for overseeing the GPS, and results are reviewed at the highest levels of the organisation, including the Group Executive Team (GET). Survey feedback is also discussed within teams to develop localised action plans.

One of our strategic people goals is to ensure that at least 90% of employees feel proud to work at Lyreco, a key business indicator alongside our financial KPIs. In 2024, the GPS score was 83% (2023: 87%), with a significant increase in the response rate from 72% in 2023 to 81% in 2024, reflecting improved employee participation.

In response to the 2024 GPS results, we launched a Group-wide action plan focusing on four key areas: local team engagement, growth and development opportunities, reward transparency, and strategy alignment. Actions include empowering individual learning, enhancing training offers, improving clarity around reward processes, and cascading strategy forums across all levels.

We constantly work on the awareness campaigns. This year, we've focused on increasing awareness of sustainability within Lyreco. We enhanced internal communication to boost engagement and strengthen sustainability knowledge across our workforce.

Inclusive communication channels

To ensure all employees, including vulnerable or marginalised groups, can voice concerns and access information, we use a multi-channel communication approach. This includes face-to-face meetings, Workday announcements, Viva Engage, SharePoint, internal newsletters, and printed materials on-site. Blue-collar workers receive printed and digital updates. Content is written in clear, non-technical language and translated into local languages.

Potential barriers to engagement are mitigated by offering anonymous feedback options, encouraging open dialogue, and leveraging both formal and informal communication mechanisms. Diversity, equity, and inclusion (DEI) initiatives provide the foundation for engaging with marginalised groups.

S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns

We address material negative impacts on our workforce primarily through established internal People & Culture (P&C) procedures and initiatives. These include local investigations, corrective actions, and, where relevant, support such as redeployment, compensation, or additional training.

Formal grievance mechanisms are in place across all Lyreco entities. These are supported by P&C procedures, compliance policies, and, where applicable, local employee representation structures such as works councils. All employees, regardless of employment type (permanent, temporary, or agency), have access to these mechanisms at the level of their employment or contract.

Employees are encouraged to report any concerns or complaints related to harassment, discrimination, legal or financial impropriety, or other workplace issues through various internal channels. These include line managers, local P&C or Finance teams, or our independent whistleblowing platform, which is available to all employees and external stakeholders. This platform ensures safe, confidential, and anonymous reporting, and is further described in section G1-1.

We enforce a strict zero-tolerance policy against retaliation. Respect for the individual is a core company value. If an employee experiences or fears retaliation, they are encouraged to contact their local Ethics referent. We will take appropriate measures to investigate and resolve the situation while protecting the individual.

All issues raised through formal channels are tracked locally by P&C and Compliance teams, and at Group level by the Group Compliance director and the Ethics Committee. Follow-up actions are monitored, and resolution status is documented to ensure proper handling and support the continuous improvement of grievance mechanisms.

PROGRESS IN 2024

S1-4 Taking action on material impacts on own workforce, and approaches to managing risks and pursuing opportunities related to own workforce, and effectiveness of those actions

We are finalising the identification of our material impacts, risks, and opportunities (IROs) related to our own workforce. Once this process is complete, comprehensive action plans will be developed to address the identified areas.

In 2024, our Compliance team together with local experts conducted a human rights assessment to identify geographies within Lyreco Group's own operations and value chain which we should prioritise to minimise any impacts. The assessment highlighted the need for us to be mindful of our presence in countries that have a higher risk of human rights issues. We are analysing the results in full and will adopt targeted actions to address the findings.

To prevent and mitigate negative impacts on our workforce, we have reviewed P&C policies and procedures, enhanced mental health support programmes, provided employees with additional training, and conducted regular workplace condition assessments. Mental health and wellbeing are an important area of focus for Lyreco. We recognise that efforts to improve pay, flexibility and job security will fall short if our people feel unsupported or stressed. We offer awareness programmes on stress management and mental health to all employees. These equip participants with valuable tools to cope with any personal or work-related challenges they are facing and contribute to a more resilient and engaged workforce.

As part of our strategy (People pillar), we are progressively rolling out ISO 45001 certification across our country operations to reinforce occupational health and safety management practices. These initiatives form part of broader, ongoing efforts to manage potential risks and foster a safe and supportive work environment. Further actions will be detailed once the final IROs are validated, ensuring full alignment with our sustainability goals.

The effectiveness of workforce-related actions is assessed through several mechanisms, including the Great People Survey (GPS), which evaluates employee engagement and satisfaction. We also monitor the impact of training programmes and wellbeing initiatives, while KPIs related to turnover, retention, and development programme participation are reviewed annually to measure outcomes.

Positive impact on own workforce

We foster positive impacts on our own workforce through a variety of initiatives, including career progression programmes, internal mobility programmes, and strategic investment in training and skills development. Flexible working arrangements, which allow employees to balance remote and office work, further contribute to workforce satisfaction. Additionally, our community engagement initiative, Lyreco for Education, enhances employee pride and purpose.

To capitalise on material opportunities, we are enhancing employee engagement through leadership development, expanding upskilling efforts, and promoting diversity and inclusion. Programmes such as Lyreco Talent Pools, Lyreco Pioneers, and Great Lyders contribute to workforce wellbeing and opportunity creation.

To support a just transition, we are providing sustainability training for all employees. Additional internal programmes on climate-related topics are in development to equip our workforce with the skills and awareness needed for the green transition.

S1 Own workforce - Some of our many local initiatives

Our people are at the core of everything we do. Across Lyreco countries, dedicated local initiatives ensure the effective implementation of our social policies, fostering a positive work environment and advancing our commitment to employee wellbeing, inclusion, and development.

Poland: ESG advocacy

Lyreco Poland has been a signatory to the Diversity Charter since 2020 and to the Charter on Children's Rights in Business since 2023. Both demonstrate its commitment to building a work environment based on respect, equal opportunities, and social responsibility.

In 2024, as a Strategic Partner at the Cleaning Forum 2024 in Poznań, Lyreco Poland conducted a lecture titled "ESG as a foundation for stable growth," providing practical guidance on integrating ESG principles into business strategies.

UK & Ireland: Workplace safety and inclusion

The "Workwear for Women" (WWFW) project developed workwear tailored specifically for women to enhance safety and comfort, addressing gender biases in traditional workwear designs. Smart safety helmets and PPE integrating IoT technology were introduced to monitor and minimise workplace risks in real-time. The PPE Protect Platform was launched, providing customised personal protective equipment, including bespoke ear protection and sight correction services, in collaboration with Intersafe.

Benelux: In-person sustainability training for Sales

In collaboration with Group Sustainability, Lyreco Benelux piloted a dedicated sustainability training programme for sales teams. The training is designed to build confidence when discussing environmental and social topics with clients. Five Sales colleagues were trained in 2024 as internal trainers to support a broader rollout across 15 corporate sales teams in 2025. Training topics include climate change and its impact, customer expectations regarding sustainability, and pricing of sustainable products.

Italy: OctoberPink prevention campaign

To mark Breast Cancer Awareness Month, Lyreco Italy organised an awareness and prevention campaign in October 2024. In partnership with Sylvamo and Komen Italia, employees participated in initiatives promoting early diagnosis and wellbeing. A key highlight was a webinar led by Dr. Alessandra Huscher, an oncology radiotherapy specialist and President of Komen Lombardia, focusing on the importance of regular check-ups and secondary prevention for both women and men. The campaign also included the promotion of the PinkReam paper product and participation in the Race for the Cure event.

Iberia: Promoting diversity, equity and inclusion

Lyreco Iberia reinforced its commitment to DE&I by collaborating with foundations to commemorate International Women's Day and the International Day of Persons with Disabilities. For International Women's Day 2024, Lyreco highlighted the achievements and voices of female employees across roles, sharing personal stories and reflections on career development. On the International Day of Persons with Disabilities, Lyreco Iberia promoted disability inclusion through dedicated events designed to raise awareness and encourage inclusive workplace practices. As part of its broader people strategy, Lyreco Iberia was recognized with the Top Employer certification, highlighting its strong HR practices and ongoing efforts to create a respectful, equitable, and inclusive workplace.

PERFORMANCE, METRICS, TARGETS

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Targets related to our own workforce will be defined following the finalisation of the material impacts, risks, and opportunities (IROs). These will align with relevant KPIs and focus on wellbeing, development, and safety. One strategic target already in place under the Great Impact Strategy is for 90% of employees to feel proud to work at Lyreco by 2026.

The Great People Survey (GPS), detailed in S1-2, is the primary tool used to assess and monitor progress on employee experience and wellbeing. While targets are led by management, insights from GPS and other feedback mechanisms are taken into account. In areas such as health, safety, and wellbeing, employee representatives may directly contribute to defining or validating targets at both Group and local levels.

Performance updates are shared through townhalls, SharePoint, Viva Engage, and the annual Sustainability Report. These communication channels promote transparency, keep employees informed, and allow for feedback on progress.

Post-performance reviews and engagement activities, such as focus groups conducted after GPS results, offer employees a chance to reflect on experiences and contribute to future improvements. Subsidiaries also share progress on sustainability-related targets to our P&C and Sustainability Community, which consists of representatives from each subsidiary, ensuring a continuous improvement loop based on workforce input.

S1-6 Characteristics of Lyreco's employees

Lyreco operates directly in 25 countries across Europe and Asia. As of 31 December 2024, Lyreco employed 10,610 people across its operations.

Employee data is compiled using standardised methods based on headcount and full-time equivalent (FTE) calculations, with Workday serving as our central HR information system. This ensures consistent and up-to-date tracking of contract types, employment status, and working hours. Both headcount and FTE metrics are used, with figures reported as of the end of the reporting period for clarity and comparability.

In 2024, 1880 employees left Lyreco Group, resulting in an overall turnover rate of 17.72%.

Additional information and metrics, including workforce composition by gender, age, contract type, and geographical distribution, is presented in the ESRS KPI tables available as Appendix to this Report.

S1-7 Non-employee workers

We engage several categories of non-employees to support our operations, including self-employed contractors, temporary and agency workers, and individuals delivering outsourced services such as logistics, IT, and facility management. These workers are typically engaged through contractual agreements or third-party service providers.

As of the 2024 reporting period, data on non-employees is collected primarily through country-level surveys and partially tracked in Workday. Reporting is based on headcount at the end of the reporting period.

Due to limitations in data coverage and methodology, current figures do not capture all categories of non-employees. Efforts are underway to formalise data collection processes, improve accuracy, and ensure alignment with CSRD/ESRS requirements in future reporting cycles.

S1 7: Non employees in own workforce

KPI ID	KPI name	2022	2023	2024
S1 7_01	Number of non employees (total contingent workers)	67	182	283
S1 7_02	Number of non employees: self employed/ consultant	not available	not available	119
S1 7_03	Number of non employees: provided by employment service providers	not available	not available	114

S1-8 Collective Bargaining and Worker Representation

We are committed to ensuring fair and consistent working conditions for all employees, including those not covered by collective bargaining agreements. In 2024, a Group-wide data collection was conducted for the first time to map collective agreement coverage across countries. Based on collected data, 52% of employees are covered by collective bargaining agreements, with 67% of countries with a collective agreements in place.

In locations without such agreements or formal tracking, local practices are aligned with our Code of Ethics to maintain equitable standards.

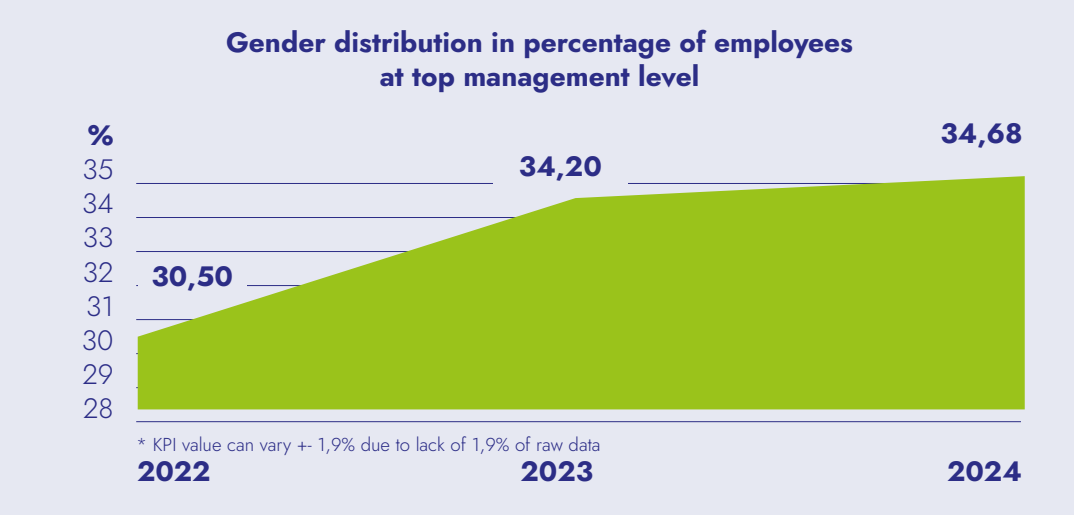
For non-employees, such as agency and contract workers, working conditions may be influenced by collective agreements applicable to Lyreco employees, although the extent varies by country and legal context.

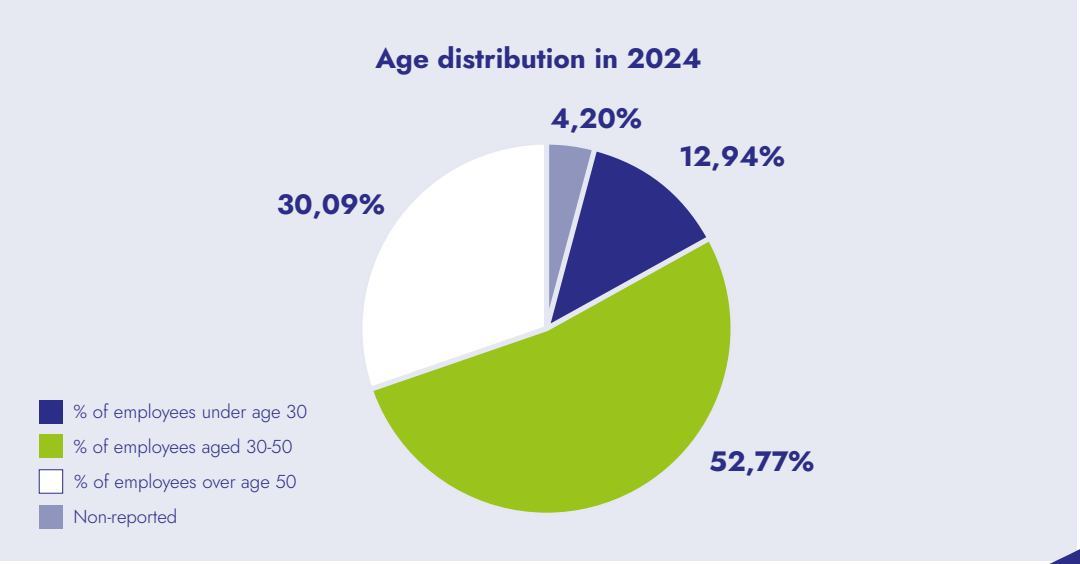
We have a formal agreement in place establishing a European Works Council (EWC), which ensures employee representation and consultation on transnational matters impacting working conditions across EU countries.

S1-9 Diversity metrics

In 2024, we maintained our commitment to a more gender-diverse workforce, with a ratio of 54% male and 43% female employees across our global organisation (remaining 3% did not disclose their gender), compared to 56% and 40% in 2023 (remaining 4% did not disclose

their gender). The ratio of women in managerial roles stayed at the same level as in 2023, 34%. Detailed diversity metrics are presented in the following table.





S1-10 Adequate wages

All our employees in European countries are paid an adequate wage in line with Directive (EU) 2022/2041, and 100% of our employees in non-European countries are paid an adequate wage in line with applicable national benchmarks. We incorporate national benchmarks when determining wages for all employees to ensure they receive an adequate wage.

We recognise that some countries where Lyreco operates present a higher risk of human rights impacts due to minimum wages falling below living wage standards. To address this, we will launch a Group-wide pay project in 2025 to assess wage adequacy and social protection benefits more comprehensively, aiming to reinforce fair pay and employment conditions across the Group.

Where works councils are in place, wages are negotiated in accordance with collective agreements.

S1-11 Social protection

At Lyreco Group, we prioritize the well-being of our employees by ensuring access to social protection across all key life events. All employees (100%) in our own workforce are covered - either through national systems or company-provided benefits - for income loss due to sickness, unemployment, employment injury and acquired disability, parental leave, and retirement.

In many countries, Lyreco goes beyond legal requirements by offering enhanced benefits such as extended sick leave, additional parental leave, and supplementary health services. In 2024, we launched a Group-wide assessment to identify any potential gaps in coverage and to evaluate where additional benefits exceed local social policy standards. This includes identifying any categories of employees not fully covered by social protection schemes and tracking regional differences in coverage levels.

S1-12 Employees with disabilities

We are currently working on collecting and consolidating data regarding employees with disabilities across all countries where we operate. Given the varying legal frameworks and definitions of disability, the data collection process is designed to respect local legal constraints, including instances where disclosure of disability status is not legally permitted.

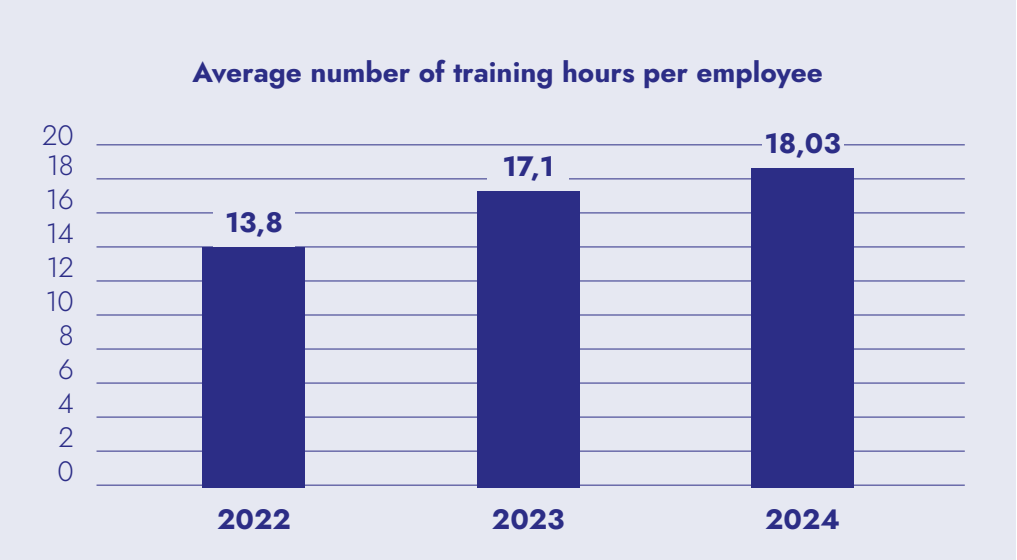
Our aim is to provide contextual information explaining how data is compiled, including regional definitions, data sources, and validation processes. This will ensure an accurate and meaningful disclosure. Final reporting will be made once data consolidation and verification are completed, with full consideration of privacy and data protection obligations.

S1-13 Training and skills development metrics

At Lyreco, all of employees receive a career development plan aligned with annual objectives jointly defined with their direct manager and the manager's manager, in line with People & Culture (P&C) guidelines. These plans are designed to capture our employees' aspirations, competencies, self-awareness, and skill needs to support individual growth and business performance. Career development plans serve as the foundation for annual performance

and development reviews (PDR). A voluntary mid-year PDR is also available, allowing for review and adjustment of objectives and development plans if circumstances evolve during the year. In 2024, 87.83% of employees completed the full annual PDR process. This KPI was externally assured, as detailed in the Assurance Statement provided in the Appendix to this Report.

We offer a broad range of skills development training to support employees in their current roles and future career progression. These include job-specific technical training, personal development programmes such as communication and leadership skills, and optional learning opportunities in areas like digital tools, project management, and other relevant competencies. Employees are encouraged to take ownership of their development by selecting training that aligns with their individual goals and business needs.



S1-14 Health & safety metrics

At Lyreco, we recognise our responsibility to safeguard the health and safety of our employees, subcontractors, customers, and the public. Our goal is to ensure the well-being of all employees and protect them from any potential safety hazards or severe injuries in the workplace.

Our health and safety management system is based on industry standards, including the QSS (Quality Safety Standards). These standards are critical for ensuring that the health and safety of our employees are consistently managed and audited internally, with external certification processes also in place to ensure compliance and continuous improvement. We do not have any restrictions or limitations on work-related health data. Therefore, we are reporting the number for the entire global organisation.

In 2024, 4764 employees undertook health and safety training, comprising 45% of our global organisation (44% in 2023). Through last three years there were no fatalities in own workforce or other workers on our sites due to work related injuries or ill health. 96% of our own workforce is covered by health & safety management systems, comparing to 94% in 2023.

S1 14: Health & Safety

KPI ID	KPI name	2022	2023	2024
S1 14_04	Total number of recordable work related accidents (own workforce)	not available	191	212
S1 14_05a	Lost Time Injury Frequency Rate*	4	11.8	13.2
S1 14_05b	Lost Time Injury Severity Rate**	0.7	0.4	3.8
S1 14_07a	Number of days lost due to work related injuries, ill health, and fatalities	not available	6379.5	61043.4
S1 14_07b	Total number of hours worked	not available	16,138,360.19	16,041,982.77

Formula: (number of occupational accidents with leave / total hours worked)(10^6).

**Formula: (number of lost working days due to injuries * 1000) / (total hours worked).

S1-15 Work-life balance metrics

We ensure that our employees are entitled to family-related leaves, either through social policy or through collective bargaining agreements. In 2024, 94.4% of employees were entitled to family-related leave. In 2024, 10.5% of entitled employees took family-related leave (45.5% men, and 55.5% women).

We offer flexible working conditions and provide individual arrangements when needed, supporting work-life balance and accommodating diverse personal and professional needs across our workforce.

S1-16 Remuneration metrics (pay gap and total remuneration)

We are assessing external methodologies to calculate the remuneration ratio adjusted for purchasing power across countries, ensuring fair and comparable insights. Once validated, the methodology and key assumptions will be disclosed to ensure transparency and comparability.

Gender pay gap data is not yet collected across all Lyreco subsidiaries, and Group-level consolidation is not currently in place. To provide an indicative figure, we use proxy data from Eurostat, applying country-specific gender pay gap percentages to the countries in which we operate and calculating a weighted average for the Group.

S1 16: Remuneration metrics

KPI ID	KPI name	2022	2023	2024
S1 16_01	Gender pay gap (%)	not available	12.53%**	12.35%**

**proxy data based on Eurostat statistics; excluding Asia.

S1-17 Incidents, complaints and severe human rights impact

In 2024, a total of 22 grievance cases were raised. Of these cases, 0 were substantiated, leading to no disciplinary actions and remediation plans. The number of cases raised through the whistleblowing system is detailed in G1-1. No cases of severe human rights incidents (e.g., forced labour, human trafficking, or child labour) were identified during 2024.

Lyreco For Education

Since its launch in 2008, the vision of Lyreco For Education has been to support better education by providing safe, inclusive, and sustainable school environments. The programme also integrates climate change awareness, strengthens educational resources, and encourages active involvement from school leadership, local authorities, and families. With each new initiative, this commitment has become an integral part of our company culture.

Through Lyreco For Education, we channel the dedication and generosity of our employees into fundraising initiatives across all the countries where we operate. Thanks to this collective effort, we have raised over €4 million in the past 15 years to help improve access to education for children worldwide.

We have already completed projects to improve the quality and equality of education in Bangladesh, Vietnam, Brazil, Togo, Madagascar and Cambodia. Since 2023, we have been developing a new initiative to support 10 schools in Ethiopia.

Ethiopia 2023–2025

In partnership with CARE, we are committed to enhancing the infrastructure and quality of education in Bahir Dar, Ethiopia. By the end of 2025, Lyreco's community of more than 12,000 employees will work together to raise €1 million for this cause.

Through our partnership with CARE, we will create a positive impact for:

- More than 17,000 children
- 11 schools
- 400 teachers and school workers
- 54,000 family members indirectly

In 2024, we raised €393,163 for the schools in Ethiopia. As a result:

- Construction progress in the initial six schools has reached 91%.
- Five new schools have been selected, replacing rural schools affected by conflict. Construction in these sites is currently at 50% progress.
- A total of 309 community members have received a training on water, sanitation, and hygiene (WASH), facilities management, menstrual health and school gardening.
- Nine schools are already organising events related to WASH and menstrual health awareness.

Lyreco For Education reflects our strong commitment to social responsibility, fostering positive change, and making a lasting difference in the communities we support. Together, we aim to build a future where education is accessible to all, and every child has the chance to reach their dreams.

PROGRESS: GOVERNANCE INFORMATION

Lyreco

SUSTAINABILITY REPORT 2024 | GOVERNANCE INFORMATION | ESRS G1 BUSINESS CONDUCT

BUSINESS CONDUCT

At Lyreco Group, we adhere to high ethical standards and are committed to conducting our business with honesty and integrity in all interactions and aspects of our operations. We ensure compliance with the laws and regulations of each country in which we operate including those related to anti-corruption, data protection, fair competition and respect for human rights.

As a global organisation in the wholesale and distribution sector, we cooperate and engage daily with customers, suppliers and business partners. Therefore this exposes us to the risk of corrupt business practices, particularly in high-risk positions and countries. We are continually enhancing our Ethical Package and rely on building and maintaining a common understanding of the standards we expect in business conduct with our workforce, suppliers, and other third parties.

BUSINESS CONDUCT IMPACTS, RISKS AND OPPORTUNITIES

Disclosure requirement related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Certain parts of our organization face higher risks, particularly in Asian countries where bribery and corruption risks are elevated. Additionally, our sales representatives and logistics teams are more exposed to potential bribery and corruption from the customers.

ESRS G1 Business Conduct			Value chain connection			Time horizon		
Materiality category	**Sub-topic**	**IRO type**	**Upstream**	**Own operations**	**Downstream**	**Short term**	**Medium term**	**Long term**
Opportunity	G1a - Corporate culture	Business opportunity		x			x	
Risk	G1b - Protection of whistle-blowers	Regulatory risk	x	x	x			x
Risk	G1c - Animal welfare	Reputational risk	x	x	x			x

ESRS G1 Business Conduct			Value chain connection			Time horizon		
Materiality category	Sub-topic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
Potential negative impact	G1e - Management of relationships with suppliers including payment practices	Employment and Industrial Relations - OECD RBC (ch V.)	x					x
Risk	G1e - Management of relationships with suppliers including payment practices	Operations are not run efficiently	x	x				x
Risk	G1f - Corruption and bribery - Prevention and detection including training	Regulatory risk	x	x	x			x

Business conduct impacts

The materiality assessment (disclosure requirement IRO-2) identified a significant negative impact related to the **management of supplier relationships, including payment practices**. Delayed or inconsistent payments to the suppliers—especially small and medium-sized enterprises (SMEs)—can destabilize their finances, leading to wage reductions, postponed salaries, job insecurity, or layoffs. In severe cases, some suppliers may be forced to shut down, affecting worker's livelihoods. Financial strain may also compromise their ability to uphold labor rights and occupational health and safety standards, increasing social risks in our supply chain. To mitigate this impact, we strictly adhere to the contractual payment terms and conditions provided in our agreements through regular monitoring and timely resolution of discrepancies. A structured payment process, supported by clear Service Level Agreements (SLAs), defines procedures for managing late payments and ensures accountability.

Business conduct risks and opportunities

Whistle-blower protection – Regulatory risk

Failure to comply with the EU Whistleblower Directive could result in penalties and reputational damage. We mitigate this through a Group-wide policy, secure reporting channels, anti-retaliation measures, and regular policy reviews.

Animal welfare – Reputational risk

Though leather represents <1% of turnover, ethical risks may arise if suppliers fail to meet animal welfare standards. We address this through strict sourcing policies, supplier audits, and our Supplier Code of Ethics.

Supplier payment practices – Compliance risk

Late payments can strain supplier relationships and disrupt operations. We monitor payment processes, enforce contractual terms, and resolve issues through structured SLAs.

Corruption and bribery — Compliance and reputational risk

Weak anti-corruption controls could expose us to fines and legal action. We apply Sapin II and UK Bribery Act standards, with mandatory training, internal audits, and our "Raise Your Concern" whistle-blower system.

Corporate culture — Strategic opportunity

A strong, values-driven culture supports talent attraction, retention, and engagement. We invest in DE&I, flexible work, Lyreco Campus, and employee-led innovation (e.g. Lyreco Pioneers). Insights from our GPS survey guide workplace improvements.

OUR APPROACH TO BUSINESS CONDUCT

G1-1 Business conduct policies and corporate culture

Our compliance framework is anchored in the Group's Code of Ethics and the Supplier Code of Ethics, alongside specific policies addressing anti-corruption, whistleblowing, data protection, and IT security. These policies support our employees and suppliers in making decisions aligned with ethical standards.

The Board of Directors is ultimately responsible for the oversight of our corporate culture and business conduct, and the Group executive team is responsible for leading by example and driving a culture of business integrity. Ethics referents in each country and the Group compliance director ensure local implementation.

Code of Ethics

Our Code of Ethics reflects our identity and the way we conduct business at Lyreco. It is applicable to all our activities, at any time and wherever we operate.

It is founded on four guiding principles: our people, our business integrity, our products and assets, and our societal engagement.

Business conduct training

Ethical business conduct training is mandatory for all Lyreco employees, including members of administrative, supervisory, and management bodies. The onboarding training and periodic refreshers, available in local languages, form an essential component of our Ethical Package.

In 2024 the training programme was refreshed to align with the newly updated Code of Ethics and related internal policies, ensuring consistent understanding and application of Lyreco's values:—Respect, Excellence, Passion, and Agility—across all regions and functions.

Each year, we also do specific communications on topics where we identify higher risks. In 2024, this especially concerned gifts and invitations.

In 2025, we will build a dedicated additional training for populations representing a higher risk, such as purchasers.

Whistleblowing system

We have implemented a robust whistleblowing system to promote ethical behaviour and ensure accountability throughout the organisation. While not intended to replace regular communication or dialogue mechanisms, it offers a secure and confidential way to report any concerns regarding misconduct, unethical behaviour, or violations of our Code of Ethics.

Anyone wishing to raise a concern has several reporting options:

Their direct line manager.

A designated ethics referent.
- At local level: the finance manager/director or people & culture manager/director
- At Group level: the ethics compliance manager.

The "Raise Your Concern" alert tool, accessible via our intranet and our corporate website.

Protecting whistleblowers

We are fully committed to protecting individuals who raise concerns in good faith. We have a strict non-retaliation policy that prohibits any adverse action against those who report concerns regarding misconduct, unethical behaviour, or violations of our Code of Ethics.

To ensure the protection of whistleblowers, we provide secure and anonymous reporting channels, clear procedures for investigation and follow-up, and comprehensive safeguards against retaliation. These measures are in compliance with the EU Whistleblowing Directive (Directive (EU) 2019/1937), as well as local laws in the countries where we operate, and are subject to audits, including those by the French Anti-Corruption Agency.

Respect for individuals is one of our core values. In the event of any retaliation or risk of retaliation, the whistleblower is encouraged to contact the local ethics referent. We commit to take prompt and appropriate action to address the situation and provide recommendations to resolve it.

Our protection extends not only to the whistleblower but also to:

Facilitators: individuals who assist the whistleblower in the reporting process, whose involvement remains anonymous.

Third parties: such as colleagues or relatives of the whistleblower who may be at risk of retaliation in a work-related context.

Legal entities: linked to the whistleblower through ownership, employment, or other professional connections.

Additionally, anyone required to testify or participate in an investigation is afforded the same protection against retaliation as the whistleblower.

Investigating business conduct incidents

We are fully committed to investigating any violations of our business conduct in a prompt, impartial, and confidential manner. As reinforced in the 2023 revision of our Code of Ethics, all alerts—whether from employees or external stakeholders—are treated seriously, with clear procedures for investigation and follow-up at local and Group levels.

These concerns are also reviewed at least quarterly by our Group Ethics Committee with our CEO, Group People & Culture (P&C) director, Group finance director, Group compliance director and our ethics compliance manager.

RELATIONSHIP WITH SUPPLIERS

G1-2 Management of relationships with suppliers

Supplier Code of Ethics

At Lyreco, we uphold a Supplier Code of Ethics that reflects our commitment to ethical business practices, sustainability, and respect for human rights. This Code is integral to our supplier relationships and is designed to ensure that our supply chain operates with integrity and responsibility.

Our Supplier Code of Ethics sets the minimum ethical and professional standards required from all suppliers working with Lyreco. It is a mandatory prerequisite for any collaboration and is integrated into our supply agreements . Compliance with this Code is a key criterion in supplier evaluation, selection, and performance monitoring.

The Supplier Code of Ethics does not replace applicable international, EU, or local laws and regulations. Instead, it complements them, and where discrepancies exist, the most stringent requirement will apply. Our Suppliers are expected not only to comply with these requirements but also to cascade these obligations to their own sub-contractors and business partners throughout the value chain.

Risk management and auditing

To ensure compliance with our Supplier Code of Ethics, we apply a risk-based approach to Supplier evaluation. This includes:

- Supplier self-assessments and documentation reviews.
- Audits and site visits (on-site or virtual) for own brand Suppliers and Lyreco Import.
- Remediation plans in case of non-compliance identified during audits.

Suppliers found in breach of the Supplier Code of Ethics who fail to address issues in a timely manner may be subject to contract termination.

Fair commercial practices and payment terms

We also recognise our own responsibility in supplier relationships. We apply fair and transparent commercial practices, including standard payment terms to prevent late payments, particularly for small and medium-sized enterprises (SMEs). We aim to foster equitable partnerships that support the financial stability of our Suppliers.

Continuous improvement and accountability

Suppliers are encouraged to continuously monitor and improve their ethical and sustainability performance. They are responsible for implementing appropriate policies and procedures to comply with our Supplier Code of Ethics and to assess risks of non-compliance within their operations and supply chain.

The Supplier Code of Ethics is regularly reviewed and updated to reflect evolving legislation and best practices. All Suppliers must read, sign, and comply with the latest version, and are expected to cooperate fully during any due diligence or monitoring activities conducted by Lyreco.

Animal welfare

Animal welfare is addressed in our Supplier Code of Ethics under broader ethical sourcing and sustainability principles. While it is not a core operational risk, we remain open to further elaborating these commitments as needed, especially in supplier and procurement contexts.

ANTI-CORRUPTION AND BRIBERY

G1-3 Prevention and detection of corruption and bribery

At Lyreco Group, we have a zero-tolerance towards bribery and corruption, reflecting our strong commitment to ethical conduct and integrity across all business activities, markets, and partnerships.

We strictly comply with all applicable anti-corruption and anti-bribery laws in the countries where we operate. This includes the United Nations Convention against Corruption (UNCAC), the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and the French Sapin II law, which we apply globally across Lyreco entities.

We explicitly prohibit any form of corruption, bribery, or facilitation payments at Lyreco Group. This stance is communicated through our Code of Ethics and reinforced by a dedicated internal anti-corruption procedure, both of which are part of our mandatory compliance framework.

Investigating anti-corruption and bribery claims

The investigation process is designed to be impartial. Investigators or committees involved in assessing allegations operate independently from those responsible for prevention and detection of corruption and bribery. This structure is described in our internal procedure related to alert management.

Our Ethical Package includes procedures for reporting outcomes of investigations to relevant governance bodies, especially our ethics committees at Group and local level, ensuring transparency and accountability.

Functions that are most at risk of corruption and bribery

We are aware that certain roles, such as sales representatives and merchandising teams, may inherently carry higher exposure to the corruption and bribery.

To the present day, there have been no public legal cases related to corruption or bribery involving Lyreco or its employees and no confirmed incidents of corruption or bribery have been reported in the past three years, which has deprioritised the need for a formal mapping of risk-prone functions. Nevertheless, an analysis and targeted training programme for these 'at-risk' profiles is planned for 2025 as part of a broader effort to strengthen our ethical safeguards.

Training and communication

All employees, regardless of role or location, are required to complete mandatory anti-corruption and ethics training, both during onboarding and through periodic refresher sessions.

Suppliers are also expected to comply with our anti-corruption standards as detailed in our Supplier Code of Ethics (see G1-2). We require them to implement similar controls within their own operations and supply chains.

G1-4 Incidents of corruption or bribery

In 2024, there were no reported violations of our Code of Ethics or reported incidents relating to human rights, fraud, corruption, bribery, or breach of anti-trust or competition laws. Lyreco Group did not receive any convictions or fines for violation of anti-corruption or anti-bribery laws, nor has it been the subject of any legal actions relating to corruption or bribery in 2024.

G1-3 to G1-4: Corruption and bribery				
KPI ID	**KPI name**	**2022**	**2023**	**2024**
G1-3_07	Percentage of functions-at-risk covered by training programmes	not available	not available	84.40%
G1-4_01	Number of convictions for violation of anti-corruption and anti-bribery laws	0	0	0
G1-4_03	Percentage of total workforce trained on business ethics issues	not available	41%	21%
G1-4_03	Hours of training for workforce on business ethics issues	not available	not available	2,860.25
G1-4_04	Number of confirmed incidents of corruption or bribery	0	0	0
G1-4_06	Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0	0	0
G1-4_07	Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0	0	0

POLITICAL INFLUENCE & LOBBYING ACTIVITIES

G1-5 Political influence and lobbying activities

Lyreco Group does not provide funding to political parties, nor does it engage in lobbying activities.

No members of our Board of Directors, Group executive team or management team have held roles in public administration or regulatory bodies in the two years prior to the 2024 reporting period.

DATA PROTECTION AND SECURITY

Data protection and security is a crucial asset for our Group, and we maintain high ethical standards in its handling. We do not engage in data trading and have robust processes to protect against unauthorised disclosure. Our data processing agreements outline clear requirements for third-party compliance with data protection and ethics.

Data ethics

At Lyreco Group, data ethics is a priority that goes beyond meeting legal requirements for data privacy. As data is a valuable asset for our business, our daily operations are guided by a detailed security policy rooted in the principles of respect and integrity:

- We have strict standards for data collection and usage.
- We hold ourselves to high standards for collecting data from our assets and other sources.
- We have strict requirements for our partners from whom we receive data.
- We avoid extensive data collection that could be perceived as data-driven surveillance.

Our chief operation officer is the most senior person accountable for the policy.

Security, controls and awareness campaigns

We have a comprehensive Information Security Policy, which sets a common standard for information security throughout the Lyreco Group and provides a frame of reference and consistency on our information security. The Information Security Policy applies to all systems, employees, and external vendors with access to Lyreco information systems, infrastructure, and data.

In 2024, we continued to enhance our information security programme, which is designed to protect and improve the confidentiality, integrity and availability of all systems and data within the Lyreco Group. The information security programme and our IT security policies are aligned with the ISO27002 and CIS standards and include policies, processes, training, tools, and technology.

The programme is overseen by our chief operation officer together with the head of IT security and supported by the Group executive team.

Over the last 12 months, we have also conducted cyber security awareness campaigns for our employees with the aim of improving their ability to identify and report security incidents. Each campaign has included multiple mandatory training modules, such as simulated phishing campaigns and hints and tips. The training has improved the ability of our employees to identify phishing emails and automatically report these to our security team.

During 2024, we extended our business continuity plan across our operations to better prepare for emergencies such as a cyberattack. Our Information Security Policy is reviewed once a year to ensure that the policy is adequate in relation to the evolution of the profile of risks and to new practices, technologies, or standards implemented. Group IT management and the head of IT security are responsible for the maintenance of this document, and for the coordination with other requirements.

GDPR and personal data protection

We have a Group policy covering personal data protection to ensure the efficient and reliable processing of personal data and comply with the EU General Data Protection Regulation (GDPR). Additionally, the objective of the policy is to contribute to the prevention of breaches of personal data security, to ensure mitigation of damages suffered and the rapid reestablishment of adequate protection. The Group executive team oversee personal data protection. The GDPR management ensures operational implementation and maintenance. They develop policies, manuals, and instructions, provide awareness tools for employee education, and offer advice and support on data protection.

BE SECURE
PROTECT YOUR DATA

In 2024, four minor privacy incidents were recorded. These cases involved a limited number of individuals (employees, customers, or suppliers), and all were classified as low-impact situations. No significant harm or breaches of rights were identified, and appropriate mitigation measures were promptly implemented.

The personal data protection policies, handbooks and instructions will be revised regularly and at least once a year by the GDPR management. Any changes of the Personal Data Protection Group Policy shall be approved by the Group executive directors.

Training and performance data

As Lyreco employees must adhere to all data ethics, protection, and security policies, we provide extensive annual training via our e-learning platform academy. All employees must take courses in personal data protection (GDPR) and information security, in addition to the multiple awareness campaigns.

During 2024, 1687 employees globally completed the e-learning pertaining information security and personal data protection practices and processes.

ESRS G1 - Business conduct - Some of our many local initiatives

Countries across the Lyreco Group actively promote ethical business conduct and sustainability awareness by engaging with external stakeholders and participating in key events.

Switzerland: Lyreco Unboxed 2024

Lyreco Switzerland organised "Lyreco Unboxed," the country's largest B2B sustainability congress, at Umweltarena in Spreitenbach. The event brought together over 1,000 participants and 30 expert speakers to discuss topics such as sustainable supply chains, circular economy, and CO2 reduction. Designed with sustainability at its core, the congress featured vegetarian catering sourced within 40 km, encouraged public transport for all participants, and used only reusable exhibition materials. The event's sustainable approach earned it prestigious awards, including the Xaver Award 2024 and BrandEx Award 2025.

Italy: CSR and social innovation engagement

Lyreco Italy participated in the 12th edition of the CSR and Social Innovation Fair at Bocconi University in Milan, one of the most prominent Italian events focused on sustainability. Through panel discussions and exchanges with academics, businesses, and civil society, Lyreco actively contributed to dialogue on sustainability dimensions, current transformations, and the contradictions companies face while transitioning to more responsible practices.

Denmark: Sustainability transition assessment

In 2024, Lyreco Denmark partnered with Another Tomorrow to conduct a comprehensive TransitionView assessment across all departments. This internal evaluation measured the company's readiness and openness toward the green transition, identifying actionable opportunities to strengthen its sustainability roadmap and accelerate climate action.

APPENDICES

Appendix I: GRI Reporting Tables

Appendix II: ESRS Performance Metrics

Appendix III: Index of ESRS disclosure requirements (IRO-2)

Appendix IV: Content index

Appendix V: Independent auditor's Assurance Statement (selected KPI and GHG emissions)

The global goals covered are highlighted in the "Related SDG" column in the table below:

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					Requirement(s) omitted	Reason: - Not applicable - Legal prohibitations - Confidentiality constraints - Information unavailable/ incomplete	Explanation
1. The organization and its reporting practices							
GRI 2: General Disclosures 2021	2-1 Organizational details	See requirements of Directive 2013/34/EU	Lyreco Group SAS, Marly, Rue du 19 Mars 1962, France. A privately-owned company since 1926, Lyreco is directly active in 25 countries in both Europe and Asia through 15 local affiliates and a safety expertise centre. We rely on a network of strategic distribution partners to represent us in 17 other markets on 4 continents.				
	2-2 Entities included in the organization's sustainability reporting	ESRS 1 5.1; ESRS 2 BP-1 §5 (a) and (b) i	All parts included in the financial report are covered by the Sustainability Report. See page 3 "About this report". Sustainability report covers all Lyreco' entities, including acquired companies until 2024. Directly operated countries: Europe: Austria, Belgium, Czech Republic, Denmark, France, Finland, Germany, Hungary, Ireland, Italy, Luxembourg, Netherlands, Norway, Poland, Portugal, Slovakia, Spain, Sweden, Switzerland, UK. Asia: Hong Kong, Korea, Malaysia, Singapore, Thailand.				
	2-3 Reporting period, frequency and contact point	ESRS 1 §73	The reporting period refers to the financial year 2024, i.e. 2024-01-01 to 2024-12-31. The Sustainability Report follows the financial reporting and takes place annually. For questions about the content of this report, please contact: agnieszka.pochyluk@lyreco.com 2023 sustainability report was published in July 2024. The 2024 sustainability report published in July 2025.				
	2-4 Restatements of information	ESRS 2 BP-2 §13, §14 (a) to (b)	Any recalculation of data is reported in connection with key figures.				
	2-5 External assurance	See external assurance requirements of Directive (EU) 2022/2464	The accounts are not audited by an external party with the exception of the financial results. However, the report has been reviewed by our auditors to assess how well it meets the requirements of the French Commercial Code regarding non-financial information.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
2. Activities and workers				**1, 8, 10**			
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)	See page 17 "Our strategy and business model" which describes our business. Lyreco SAS is a wholesaler with a large number of suppliers. The value chain looks different depending on the product category and along the processing process a number of transports take place, see the overall value chain on pages 17-19 "SBM-1 Strategy, business model and value chain". Sustainability work is relevant to the entire value chain and we work with it in different ways. We carry out visits and audits to suppliers and factories in order to ensure responsible practices. Read more on pages 66-67 "G1-2 Management of relationships with suppliers".				
	2-7 Employees	ESRS 2 SBM-1 §40 (a) iii; ESRS S1 S1-6 §50 (a) to (b) and (d) to (e), §51 to §52	See page 55 "S1-6 Characteristics of Lyreco's employees".				
	2-8 Workers who are not employees	ESRS S1 S1-7 §55 to §56	See page 56 "S1-7 Non-employee workers".				
3. Governance				**5, 16**			
GRI 2: General Disclosures 2021	2-9 Governance structure and composition 2	ESRS 2 GOV-1 §21, §22 (a), §23; ESRS G1 §5 (b) See also corporate governance statement requirements of Directive 2013/34/EU for public-interest entities	The Group Sustainability Director is a member of the management team. The Group Sustainability Team submits the Sustainability Report, and the Group Executive Team validates it. Read more on page 12 "GOV-1 The role of the administrative, management and supervisory bodies" and "ESRS G1 – Business conduct".				
	2-10 Nomination and selection of the highest governance body	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	In accordance with Lyreco's Articles of Association, the Board of Directors, which includes the owner, decides on the composition of the Board of Directors.				
	2-11 Chair of the highest governance body	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	See page 12 "GOV-1 The role of the administrative, management and supervisory bodies".				
	2-12 Role of the highest governance body in overseeing the management of impacts	ESRS 2 GOV-1 §22 (c); GOV-2 §26 (a) to (b); SBM-2 §45 (d); ESRS G1	Lyreco's Board of Directors has signed the UN Global Compact and adopted a sustainability strategy that the management team is responsible for achieving. The management team is responsible for ensuring that the business follows established policies, works in accordance with objectives and that regulations and laws are followed. See page 12 "GOV-1 The role of the administrative, management and supervisory bodies".				
	2-13 Delegation of responsibility for managing impacts	ESRS 2 GOV-1 §22 (c) i; GOV-2 §26 (a); ESRS G1 G1-3 §18 (	The management team includes the Group Sustainability Director who is responsible for the process. Each employee has a described responsibility in their role. See pages 66-68 "Our approach to business conduct".				
	2-14 Role of the highest governance body in sustainability reporting	ESRS 2 GOV-5 §36; IRO-1 §53 (d)	The Board of Directors submits the Sustainability Report.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					Requirement(s) omitted	Reason	Explanation
3. Governance (following)				**5, 16**			
	2-15 Conflicts of interest	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	There are no conflicts of interest in the management structure or in sustainability management and the objectives.				
	2-16 Communication of critical concerns	ESRS 2 GOV-2 §26 (a); ESRS G1 G1-1 AR 1 (a); G1-3 §18 (c)	In accordance with internal policies, critical, actual and potential events are communicated to the management team and, if necessary, the Board of Directors. All cases received via the whistleblower system are forwarded to the board. No incidents were reported in 2024.				
	2-17 Collective knowledge of the highest governance body	ESRS 2 GOV-1 §23	The Board of Directors and management team are continuously trained in various sustainability areas.				
	2-18 Evaluation of the performance of the highest governance body	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	See page 8 "Our sustainability ratings and certification".			Information unavailable/ incomplete	
	2-19 Remuneration policies	ESRS 2 GOV-3 §29 (a) to (c); ESRS E1 §13 See also remuneration report requirements of Directive (EU) 2017/828 for listed undertakings	Reward models are set in consultation with the owners, board and management team. See page 14 "ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes".				
	2-20 Process to determine remuneration	ESRS 2 GOV-3 §29 (e) See also remuneration report requirements of Directive (EU) 2017/828 for listed undertakings	Reward systems are set by each responsible manager within the framework of the model with the support of People & Culture.				
	2-21 Annual total compensation ratio	ESRS S1 S1-16 §97 (b) to (c)	Data not available			Confidentiality constraints in some countries	Included in salary survey but not externally communicated
4. Strategy, policies and practices				**16**			
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	ESRS 2 SBM-1 §40 (g)	See page 17 "SBM-1 Strategy, business model and value chain".				
	2-23 Policy commitments	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR	The management team is responsible for all policy documents. Our Supplier Code of Ethics and other policy documents are communicated to our suppliers and are available in local languages. Relevant policy documents, certificates and whistleblower systems are available on our website. All employees are covered by our Code of Ethics, which contains guidelines for anti-corruption and equal treatment, and undergo an introductory training course with a review of the company's policies and whistleblower system. All employees also undergo training in our sustainability work and their responsibility to achieve set goals. Read more under "ESRS 2 General disclosures" pages 9-26 and in chapter "Progress", see pages 63-74.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					Requirement(s) omitted	Reason	Explanation
4. Strategy, policies and practices (following)				**16**			
	2-24 Embedding policy commitments	ESRS 2 GOV-2 §26 (b); MDR-P §65 (c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g	Policy commitments related to sustainability, ethics, and human rights are embedded through structured governance, internal procedures, and regular training. Our Code of Ethics and Group sustainability policies are communicated across all entities and form part of onboarding, internal audits, and annual reviews. Key functions such integrate these commitments into their operational practices. Suppliers must adhere to our Supplier Code of Conduct, and compliance is monitored through assessments and follow-ups. Policy implementation is supported by dedicated teams, awareness campaigns, and reporting mechanisms to ensure accountability and continuous improvement.				
	2-25 Processes to remediate negative impacts	ESRS S1 S1-1 §20 (c); S1-3 §32 (a), (b) and (e), §AR 31; ESRS S2 S2-1 §17 (c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33 (c); ESRS S3 S3-1 §16 (c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33 (c); ESRS S4 S4-1 §16 (c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32 (c)	Lyreco has established processes to remediate negative impacts related to its operations, with mechanisms in place for both internal and external stakeholders to raise concerns. These include a Group-level whistleblowing system managed independently, as well as grievance procedures available to employees and business partners. Reported cases are assessed, investigated, and addressed through corrective actions led by relevant departments (Compliance, Finance, Legal, People & Culture). For suppliers, identified issues—such as those flagged during assessments or audits—trigger follow-up actions, including improvement plans or, if needed, contract review. We regularly review these processes to ensure accessibility, fairness, and effectiveness. See pages 49-50 "S1-1 Policies related to own workforce" and 52 "S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns".				
	2-26 Mechanisms for seeking advice and raising concerns	ESRS S1 S1-3 §AR 32 (d); ESRS S2 S2-3 §AR 27 (d); ESRS S3 S3-3 §AR 24 (d); ESRS S4 S4-3 §AR 24 (d); ESRS G1 G1-1 §10 (a); G1-3 §18 (a)	We provide multiple channels for employees and stakeholders to seek advice and raise concerns, including an independently managed whistleblowing platform available in all operating countries. Internally, employees can consult with direct manager, P&C, Finance, or Compliance teams for guidance on ethical, legal, and other sustainability-related matters. See page 52 "S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns" and pages 68-69 "G1-1 Business conduct policies and corporate culture".				
	2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48 (d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24 (a)	In 2024, there were no fines or non-monetary sanctions for non-compliance with laws and regulations. See pages 66-68 "Our approach to business conduct".				
	2-28 Membership associations	Political engagement' is a sustainability matter for G1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	At Group level, Lyreco is a participant of the United Nations Global Compact, demonstrating our commitment to its principles on human rights, labour, environment, and anti-corruption. In addition, Lyreco entities across countries are active members of various national and industry-specific associations related to sustainability, workplace safety, logistics, and responsible sourcing.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
5. Stakeholder engagement				**8, 17**			
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20 (b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17 (b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16 (b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16 (b); S4-2 §18, §20 (d) and §21	See pages 20-23 "Our stakeholders".				
	2-30 Collective bargaining agreements	ESRS S1 S1-8 §60 (a) and §61	See page 56 "S1-8 Collective Bargaining and Worker Representation".				
Material topics							
2.Disclosures of material topics							
GRI 3: Material Topics 2021	3-1 Process to determine material topics	ESRS 2 BP-1 §AR 1 (a); IRO-1 §53 (b) ii to (b) iv	Our materiality analysis integrates upstream, operational, and downstream perspectives and is embedded in Lyreco's global risk assessment process. In 2024, we conducted our first double materiality assessment in alignment with CSRD requirements. All key functions participated in identifying and assessing Impacts, Risks, and Opportunities (IROs) across the full range of ESRS topics. This collaborative process led to the development of a materiality matrix outlining our most significant sustainability topics. See more on page 10 "ESRS 2 BP-1 General basis for preparation of the sustainability statement".				
	3-2 List of material topics	ESRS 2 SBM-3 §48 (a) and (g)	Our materiality analysis, conducted in line with CSRD and ESRS requirements, helps prioritize the sustainability topics most relevant to Lyreco's operations and value chain. The current list of material topics includes: ESRS E1: Climate Change ESRS E2: Pollution ESRS E5: Resource Use and Circular Economy ESRS S1: Own Workforce ESRS S2: Workers in the Value Chain ESRS S4: Consumers and End-users ESRS G1: Business Conduct As this is our first reporting cycle aligned with CSRD, we have chosen to focus this year on the three most critical topics: E1 (Climate Change), S1 (Own Workforce), and G1 (Business Conduct). We plan to extend reporting on the remaining material topics in the next cycles.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Material topics							
Economic Performance				**8, 9, 13**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c) See below for additional linkages to specific topics.	Lyreco manages material sustainability topics in alignment with both CSRD and financial reporting principles. Our reporting scope is limited to our business activities, while recognizing the influence of key stakeholders -including suppliers, employees, and owners on our financial and non-financial performance. Material topics are monitored through regular annual review and reassessment process. The outcomes inform updated forecasts and strategic decisions, which are presented to senior management and the Board of Directors. To support ethical business conduct and accountability, a whistleblower system is available to both employees and external stakeholders, allowing anonymous reporting of any irregularities or concerns related to our operations or value chain.				
GRI 201: Economic performance 2016	201-1 Direct economic value generated and distributed	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	In accordance with financial reporting rules, our results are limited to our operations. Our financial results are affected by various stakeholders, including our suppliers (payment for products/services), employees (salary) and our owners (return).				
	201-2 Financial implications and other risks and opportunities due to climate change	ESRS 2 SBM-3 §48 (a), and (d) to (e); ESRS E1 §18; E1-3 §26; E1-9 §64	83.7% of our business's climate impact comes from the products we offer to the market, i.e. our entire source of income. Among them, we have identified the major climate impacts and are taking measures to reduce the negative climate impact. Read more on page 33 "Climate change risks and opportunities".		201-2 v	Information unavailable/ incomplete Confidentiality constrains	Detailed data is available on which product groups and customer agreements have the most climate impact, but is not complete and in many cases is provided with a confidentiality clause towards the customer.
	201-3 Defined benefit plan obligations and other retirement plans	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report		201-3 a-d	Confidentiality constraints	Found in the annual financial statements with some reservations regarding confidentiality.
	201-4 Financial assistance received from government	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report		201-4 a-c	Confidentiality constraints in some countries	Found in the annual financial statements.

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Economic Performance (following)				**8, 9, 13**			
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	ESRS S1 S1-10 §67-71 and §AR 72 to 73	Lyreco ensures fair and equal remuneration practices through collective agreements and collaboration with trade unions. Entry-level wages are determined based on the salary structures outlined in these collective agreements, which apply equally to all employees regardless of gender. Salary audits and salary surveys are regularly conducted in cooperation with trade unions to ensure that wage practices are equitable and aligned with both legal requirements and internal fairness standards.				
	202-2 Proportion of senior management hired from the local community	Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Lyreco values local expertise and knowledge of regional market conditions, culture, and regulations. A significant proportion of senior management positions are held by individuals hired from the local community, defined as individuals who are nationals or residents of the country where the operations are located.				
Indirect economic impacts				**1, 3, 5, 8, 9, 11**			
GRI 3: Material Topics 2021	3-3 Management of material topics		Our materiality analysis includes indirect impacts both upstream, operational and in a downstream perspective and is woven into our global risk management framework from which the management team sets the annual sustainability targets. An in-depth sub-process also takes place in the Due Diligence mapping. See also page 15 "Statement on due diligence".				
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Read more about how we build employee engagement through GPS survey, and how we contribute to the important work of local and global volunteer organizations under "Lyreco for Education" on pages 61-62 and our investments in circular solutions on pages 43-44.		203-1 Information	Information unavailable/ incomplete	Direct investments in actual figures can be found in our annual financial report.
	203-2 Significant indirect economic impacts	ESRS S1 S1-4 §AR 41; ESRS S2 S2-4 §AR 37; ESRS S3 S3-4 §AR 36	See pages 52 "S1-4 Taking action on material impacts on own workforce, and approaches to managing risks and pursuing opportunities related to own workforce, and effectiveness of those actions".				
Procurement practices				**8**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-2 §12	Lyreco recognizes the strategic importance of sustainable procurement in creating long-term value and supporting the economic development of the communities in which we operate. Procurement practices are managed in alignment with our responsible sourcing policy and Group Code of Ethics, which emphasize transparency, fairness, and support for local economies. Read more on page 36 "Sustainable Selection".				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Procurement practices (following)				**8**			
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	No data / not included in the Report				
Anti-corruption				**16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-1 §7; G1-3 §16 and §18 (a) and §24 (b)	Through our internal and external Code of Ethics, supported by procedures, processes, and regular training, we counteract corruption risks across our value chain. A whistleblower system is available to both employees and external stakeholders, allowing anonymous reporting of any irregularities. Read more on page 66-68: "G1-1 Business conduct policies and corporate culture".				
GRI 205: Ant-corruption 2016i	205-1 Operations assessed for risks related to corruption	ESRS G1 G1-3 §AR 5	Corruption risks are assessed as part of Lyreco's global risk management process. All Group operations are regularly reviewed for ethical, legal, and compliance risks, including corruption. These assessments are conducted by the Group Legal & Compliance team, supported by internal audits and due diligence processes for high-risk areas and suppliers. See more on pages 69-71 "G1-3 Prevention and detection of corruption and bribery".		205-1 a	Information unavailable/ incomplete	
	205-2 Communication and training about anti-corruption policies and procedures	ESRS G1 G1-3 §20, §21 (b) and (c) and §AR 7 and 8	Lyreco's anti-corruption policies, embedded in the Group Code of Ethics, are communicated to all employees. Mandatory training on ethical conduct and anti-corruption is provided to all new employees and refreshed regularly for key functions, especially those exposed to compliance risks (e.g. Sales, Procurement, Management). Third parties, including suppliers and business partners, are required to acknowledge and comply with Lyreco's Supplier Code of Ethics. Read more on page 71.				
	205-3 Confirmed incidents of corruption and actions taken	ESRS G1 G1-4 §25	In 2024, no incidents of corruption have been reported.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Anti-competitive behavior				**16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-1 §7; G1-3 §16 and §18 (a) and §24 (b)	We counteract anti-competitive risks through our internal and external Code of Ethics, supported by procedures, controls, and regular training. Competitive evaluations are part of our due diligence process for acquisitions and are reviewed, if necessary, by authorities. A whistleblower system is available to employees and external stakeholders, enabling anonymous reporting of suspected anti-competitive behavior. Read more on pages 66-68 "G1-1 Business conduct policies and corporate culture".				
Anti-competitive behavior (following)				**16**			
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	For Lyreco Group, there were no legal measures or trials for competitive evaluations in 2024.		206-1 a)	Not applicable	
Tax				**8, 9, 13**			
GRI 3: Material Topics 2021	3-3 Management of material topics		No data / not included in the Report				
GRI 207: Tax 2019	207-1 Approach to tax	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report				
	207-2 Tax governance, control, and risk management	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report				
	207-3 Stakeholder engagement and management of concerns related to tax	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report				
	207-4 Country-by-country reporting	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.	No data / not included in the Report				
Materials				**8, 12**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E5 E5-1 §12; E5-2 §17; E5-3 §21	Packaging from our own operations is measured and included in climate calculations, packaging is measured and reported according to legislation for producer responsibility. The overall global strategy for Lyreco is found in our Circular Economy Pledge. Read more on pages 43-44.				
GRI 301: Materials 2016	301-1 Materials used by weight or volume	ESRS E5 E5-4 §31 (a)	No data / not included in the Report			Information unavailable/ incomplete	We have data for packaging but not for all items within our wide range.
	301-2 Recycled input materials used	ESRS E5 E5-4 §31 (c)	No data / not included in the Report			Information unavailable/ incomplete	Total share of sales in 2024 of items with recycled materials is not available for the whole G

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Materials (following)				**8, 12**			
	301-3 Reclaimed products and their packaging materials	Resource outflows related to products and services' and 'Waste' are sustainability matters for E5 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	See data under "Circular Economy Pledge" on pages 43-44.				
Energy				**7, 8, 12, 13**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E1 E1-2 §25 (c) to (d); E1-3 §26; E1-4 §33	We manage energy consumption and related emissions through our Great Impact Strategy and carbon reduction plans, aligned with Science-Based Targets. Local energy efficiency plans are in place across sites, focusing on reducing electricity and fuel use. Key actions include transitioning to renewable energy where feasible, LED retrofits, building insulation upgrades and optimazing our fleets. Performance is tracked through Group KPIs and reported annually. Progress is monitored by the Group Sustainability Team. Read more on page 28-39 "ESRS E1-1-E1-4".				
GRI 302: Energy 2016	302-1 Energy consumption within the organization	ESRS E1 E1-5 §37; §38; §AR 32 (a), (c), (e) and (f)	We aim to use 100% green electricity in our facilities by 2026, including through the purchase of RECs and REGOs where on-site solar panels are not feasible. Energy-related emissions are managed under our Great Impact Strategy and aligned with SBTi targets. Calculations follow the GHG Protocol and are conducted using the Sweep platform. In 2024, renewable energy consumption reached 23,216.05 MWh, representing 17.7% of our total energy use. Additionally, in 2024 we reached 61.6% of renewable electricity in total electricity consumed. See pages 39-40 "ESRS E1-5".		302-1 c iv); 302-1 d i - iv)	Not applicable	
	302-2 Energy consumption outside of the organization	Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Energy consumption outside Lyreco's operations mainly relates to upstream and downstream logistics and supplier activities. While direct measurement remains challenging, we assess these impacts through Scope 3 GHG calculations using the Sweep platform, following the GHG Protocol methodology. Ongoing collaboration with key suppliers helps improve data quality and reduce indirect energy use across the value chain.				
	302-3 Energy intensity	ESRS E1 E1-5 §40 to §42	In 2024, Lyreco's total energy intensity was 0.0004 MWh per € of turnover. This includes electricity, fuel, and heating across all operations. Energy intensity is monitored annually to track progress toward our efficiency and SBTi-aligned targets. See pages 39-40 "E1-5 Energy consumption and mix" for more details.		302-3 b, d	Information unavailable/ incomplete	

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Energy (following)				**7, 8, 12, 13**			
	302-4 Reduction of energy consumption	Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	In 2024, Lyreco continued to implement energy efficiency measures across its operations. Several sites continued transitioning to electric vehicles. Where solar installations were not feasible, green electricity was sourced via RECs and REGOs. These actions contributed to increasing the share of overall renewable energy to 17.7%, and share of renewable electricity to 61.6% of total consumption, supporting our goal of 100% renewable energy in our facilities by 2026. See pages 39-40 "E1-5 Energy consumption and mix" for more details.				
	302-5 Reductions in energy requirements of products and services	Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Lyreco supports customers in reducing their energy footprint through eco-designed and energy-efficient products. We promote products with environmental certifications (e.g. Energy Star, EU Ecolabel) in our Sustainable Selection product portfolio. In logistics, we reduce energy use through optimized delivery routes and the gradual transition to electric vehicles.				
Water and effluents				**6, 12**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E2 §AR 9 (b); E2-1 §12; E2-2 §16 and §19; E2-3 §20; ESRS E3 E3-1 §9; E3-2 §15, §17 to §18; E3-3 §20	No data / not included in the Report			Information unavailable/ incomplete	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	ESRS 2 SBM-3 §48 (a); MDR-T §80 (f); ESRS E3 §8 (a); §AR 15 (a); E3-2 §15, §AR 20	No data / not included in the Report			Information unavailable/ incomplete	
	303-2 Management of water discharge-related impacts	ESRS E2 E2-3 §24	No data / not included in the Report			Information unavailable/ incomplete	
	303-3 Water withdrawal	Water withdrawals' is a sustainability matter for E3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	No data / not included in the Report			Information unavailable/ incomplete	

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Water and effluents (following)				**6, 12**			
	303-4 Water discharge	Water discharges' is a sustainability matter for E3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	No data / not included in the Report			Information unavailable/ incomplete	
	303-5 Water consumption	ESRS E3 E3-4 §28 (a), (b), (d) and €	Total water consumption in own operations: 33459.37 m3				
Biodiversity				**6, 14, 15**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E4 E4-1 §AR 1 (b) and (d); E4-2 §20 and §22; E4-3 §25 and §28 (a); E4-4 §29	No data / not included in the Report			Information unavailable/ incomplete	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	ESRS E4 §16 (a) i; §19 (a); E4-5 §35	No data / not included in the Report		304-1 a ii - vii	Information unavailable/ incomplete	
	304-2 Significant impacts of activities, products and services on biodiversity	ESRS E4 E4-5 §35, §38, §39, §40 (a) and (c)	No data / not included in the Report		304-2 a ii - vi; 304-2 b i-iv	Information unavailable/ incomplete	
	304-3 Habitats protected or restored	ESRS E4 E4-3 §28 (b) and §AR 20 (e); E4-4 §AR 26 (a)	No data / not included in the Report			Information unavailable/ incomplete	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	ESRS E4 E4-5 §40 (d) i	No data / not included in the Report			Information unavailable/ incomplete	
Emissions				**3, 12, 13, 14, 15**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E1 E1-2 §22; E1-3 §26; E1-4 §33 and §34 (b); E1-7 §56 (b) and §61 (c); ESRS E2 §AR 9 (b); E2-1 §12; E2-2 §16 and §19; E2-3 §20	Lyreco manages emissions through comprehensive monitoring and reduction initiatives aligned with the GHG Protocol and our SBTi targets. We measure Scope 1, 2, and key Scope 3 emissions using the Sweep platform. Our strategy includes increasing renewable energy use, improving energy efficiency, and engaging suppliers to reduce indirect emissions. Emission reduction progress is regularly reviewed by management and integrated into our sustainability governance.				
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d)	See pages 37-39 "E1-4 Targets related to climate change mitigation and adaptation", and pages 40-42 "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions".				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Emissions (following)				**3, 12, 13, 14, 15**			
	305-2 Energy indirect (Scope 2) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (b); §46; §49; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; §AR 45 (a), (c), (d), and (f)	See pages 37-39 "E1-4 Targets related to climate change mitigation and adaptation", and pages 40-42 "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions".				
	305-3 Other indirect (Scope 3) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (c); §51; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 46 (a) (i) to (k)	See pages 37-39 "E1-4 Targets related to climate change mitigation and adaptation", and pages 40-42 "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions".				
	305-4 GHG emissions intensity	ESRS E1 E1-6 §53; §54; §AR 39 (c); §AR 53 (a)	See pages 37-39 "E1-4 Targets related to climate change mitigation and adaptation", and pages 40-42 "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions".				
	305-5 Reduction of GHG emissions	ESRS E1 E1-3 §29 (b); E1-4 §34 (c); §AR 25 (b) and (c); E1-7 §56	See pages 37-39 "E1-4 Targets related to climate change mitigation and adaptation", and pages 40-42 "E1-6 Gross Scopes 1, 2, 3 and total GHG emissions".				
	305-6 Emissions of ozone-depleting substances (ODS)	Pollution of air' is a sustainability matter for E2 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	No data / not included in the Report			Information unavailable/ incomplete	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	ESRS E2 E2-4 §28 (a); §30 (b) and (c); §31; §AR 21; §AR 26	No data / not included in the Report			Information unavailable/ incomplete	
Waste				**3, 6, 8, 11, 12, 15**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS E5 §AR 7 (a); E5-1 §12; E5-2 §17; E5-3 §21	Lyreco manages waste by implementing reduction, reuse, and recycling initiatives across its operations. We track waste streams in compliance with local regulations and integrate circular economy principles to minimize landfill disposal. Our waste management strategy is supported by employee training, supplier engagement, and continuous improvement efforts aligned with our Circular Economy Pledge (pages 43-44).				
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	ESRS 2 SBM-3 §48 (a), (c) ii and iv; ESRS E5 E5-4 §30	See pages 43-44 "Circular Economy Pledge" Total waste in 2024: 10,956.53 tonnes.				
	306-2 Management of significant waste-related impacts	ESRS E5 E5-2 §17 and §20 (e) and (f); E5-5 §40 and §AR 33 ©	Lyreco tracks and manages waste impacts through collaboration with local partners in all countries. Waste is categorized by type, and the proportion recycled is systematically reported. This approach supports our commitment to circular economy principles and continuous waste reduction. See pages 43-44 "Circular Economy Pledge" for more details.		306-2 c)		The process is described in internal documents. N included sust

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Waste (following)				**3, 6, 8, 11, 12, 15**			
	306-3 Waste generated	ESRS E5 E5-5 §37 (a), §38 to §40	In 2024, Lyreco generated a total of 10,956.53 tonnes across all operations. Waste streams include packaging materials, office and warehouse waste, and end-of-life products collected from customers.				
	306-4 Waste diverted from disposal	ESRS E5 E5-5 §37 (b), §38 and §40	See pages 43-44 "Circular Economy Pledge".		306-4 d)		
	306-5 Waste directed to disposal	ESRS E5 E5-5 §37 (c), §38 and §40	See pages 43-44 "Circular Economy Pledge".		306-5 d)		
GRI 306: Effluents and Waste 2016	306-3 Significant spills	Pollution of air', 'Pollution of water', and 'Pollution of soil' are sustainability matters for E2 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	No data / not included in the Report			Information unavailable/ incomplete	
Supplier Environmental Assessment				**12, 13, 14, 15**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-2 §12 and §15 (a)	Lyreco is committed to responsible sourcing and environmental stewardship throughout its supply chain. As a signatory of the UN Global Compact and in compliance with legal frameworks such as the Vigilance Law and the upcoming Corporate Sustainability Due Diligence Directive (CSDDD), we rigorously assess and manage supplier sustainability risks. Our proprietary methodology, Sustainable Selection, guides the evaluation of suppliers and products based on environmental, social, and governance criteria, ensuring alignment with our sustainability goals. See more on page 7 "SDGs" and pages 36-37 "Sustainable Selection."				
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	ESRS G1 G1-2 §15 (b)	In 2024, all new suppliers were evaluated through Lyreco's Sustainable Selection methodology, which incorporates comprehensive environmental criteria. This ensures alignment with our environmental standards and supports our commitment to responsible sourcing.				
	308-2 Negative environmental impacts in the supply chain and actions taken	ESRS 2 SBM-3 §48 (c) i and iv	Where negative environmental impacts are identified in our supply chain, Lyreco collaborates closely with suppliers to implement corrective action plans. These include risk mitigation measures, capacity building, and, if necessary, supplier replacement to uphold our environmental commitments and reduce adverse impacts. Through our environmental product range requirements, we set stringent criteria to minimize negative impacts at the product level. All suppliers undergo regular review, and environmental expectations are embedded in our Supplier Code of Ethics. For detailed follow-up processes, see pages 32-37 "E1 - ESRS 2 SBM-3". In 2024, no suppliers were excluded due to environmental underperformance.		308-2 e)	Information unavailable/ incomplete	Share of negative impact includes both social and environmental aspects.

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Employment				**3 ,5, 8, 10**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a);S1-5 §44; §47 (b) and (c); ESRSS2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b);§36; §AR 33; §AR 36 (a); S2-5§39, §42 (b) and (c)	Lyreco's approach to employment is grounded in our commitment as a UN Global Compact participant and adherence to our Code of Ethics and Supplier Code of Ethics. We promote fair labor practices and responsible workforce management across all operations. Our systematic work environment management includes active safety committees and continuous engagement with employee representatives to ensure health, safety, and well-being. See more details on pages 45-62 in chapter "People".				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	ESRS S1 S1-6 §50 (c)	Employee turnover in 2024: 17.72%.				
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	ESRS S1 S1-11 §74; §75; §AR 75	At Lyreco, the majority of employee benefits, including health insurance, paid leave, and training opportunities, are available to both full-time and part-time employees. However, some benefits, such as certain retirement plan contributions or extended parental leave, may be exclusive to full-time employees, in line with local regulations and employment agreements.				
	401-3 Parental leave	ESRS S1 S1-15 §93	Lyreco provides parental leave in line with local laws and regulations across all countries of operation. In some countries, extended parental leave beyond legal requirements is offered to support employees' work-life balance. We also promote flexible return-to-work arrangements. In 2024, 94.4% of employees were entitled to family-related leave. In 2024, 10.5% of entitled employees took family-related leave (45.5% men, and 55.5% women). Read more on page 60 "S1-15 Work-life balance metrics".		306-2 c)	Information unavailable/ incomplete	The process is described in internal documents. Not included in our sustainability report.
Labor/Management Relations				**5, 8, 10**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a);S1-5 §44; §47 (b) and (c); ESRSS2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b);§36; §AR 33; §AR 36 (a); S2-5 §39, §42 (b) and ©	Lyreco fosters constructive labor-management relations through regular dialogue with employee representatives and collective bargaining where applicable. We support a collaborative work environment, ensuring employee voices are heard and labor rights respected across all operations.				
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Social dialogue' and 'Collective bargaining' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Lyreco complies with all applicable local laws and collective agreements regarding minimum notice periods for operational changes. We ensure timely communication with employees and their representatives to facilitate smooth transitions and minimize disruptions.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Occupational health & safety				**3, 8, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §39, §42 (b) and ©	Lyreco is committed to ensuring a safe and healthy work environment across all operations. 40% of our countries are certified to ISO 45001, and we promote systematic health and safety management through dedicated committees and internal procedures. Our approach is aligned with the UN Global Compact, our internal Code of Ethics, and the Supplier Code of Ethics. We prioritize risk prevention, employee well-being, and continuous improvement in occupational safety. See more on pages 49-54 "ESRS S1-1 to S1-4".				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	ESRS S1 S1-1 §23	Lyreco operates a health and safety management system aligned with legal requirements for systematic work environment management in all countries. Additionally, 40% of our operations are certified to ISO 45001.				
	403-2 Hazard identification, risk assessment, and incident investigation	ESRS S1 S1-3 §32 (b) and §33	Lyreco conducts regular hazard identification and risk assessments in all operations, in line with national legal requirements and ISO 45001 principles where applicable. Incidents are reported, investigated, and followed by corrective actions to prevent recurrence. Employees are encouraged to report hazards and near misses, and local safety committees monitor performance and ensure continuous improvement.				
	403-3 Occupational health services	Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Lyreco provides access to occupational health services across its operations, in accordance with local legislation. Services include health surveillance, ergonomic assessments, and health promotion initiatives.				
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	Employee participation in OHS is ensured through local Health & Safety Committees. These committees include the safety officer, trade union representatives, People & Culture, and employee representatives. Workers are regularly consulted on health and safety issues, including incident reviews and risk assessments. Communication is maintained through regular updates and annual safety rounds, reinforcing continuous awareness and engagement in occupational health and safety across all levels of the organization.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Occupational health & safety (following)				**3, 8, 16**			
	403-5 Worker training on occupational health and safety	Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	All employees receive mandatory OHS training tailored to their specific roles, including periodic refreshers. Training covers hazard identification, emergency procedures, safe work practices, and both physical and psychosocial work environments. Employees exposed to higher risks—identified through risk assessments—receive targeted training, such as for warehouse operations or forklift use, to ensure appropriate safety measures are understood and applied.				
	403-6 Promotion of worker health	Social protection' is a sustainability matter for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	We promote employee well-being through health awareness campaigns, access to psychological and physical health support, and workplace wellness initiatives, varying by country.				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	ESRS S2 S2-4 §32 (a)	Our Supplier Code of Ethics and audit processes ensure that partners uphold minimum OHS standards. High-risk activities or findings trigger mitigation plans, training, or supplier exclusion if unresolved.				
	403-8 Workers covered by an occupational health and safety management system	ESRS S1 S1-14 §88 (a); §90	96% of Lyreco workers are covered by a legally compliant OHS management system. 40% of countries operate under ISO 45001 certification.				
	403-9 Work-related injuries	ESRS S1 S1-4, §38 (a); S1-14 §88 (b) and (c); §AR 82	Injury data is tracked locally and consolidated at Group level. Total number of recordable work related accidents: 212 Fatalities: 0 Days lost: 61043.4 LTIFR: 13.2 LTISR: 3.8				
	403-10 Work-related ill health	ESRS S1 S1-4, §38 (a); S1-14 §88 (b) and (d); §89; §AR 82	Work-related illnesses are monitored through our occupational health services. No systemic issues were identified in 2024. Preventive measures are in place to address stress, burn out, musculoskeletal disorders, and workplace ergonomics.				
Training and education				**4 ,5, 8, 10**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §39, §42 (b) and ©	We promote continuous learning and career development through mandatory onboarding, role-specific training, and optional development programs. Our People Development Policy ensures equal access to training for all employees, regardless of contract type. Training is delivered via e-learning platforms, in-person sessions, and internal mobility opportunities. We monitor training participation and completion, and we align learning objectives with business needs and employee feedback. See more on pages 49-55 "ESRS S1-1 to S1-5".				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Training and education (following)				**4 ,5, 8, 10**			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	ESRS S1 S1-13 §83 (b) and §84	Average number of training hours per employee: 18.03				
	404-2 Programs for upgrading employee skills and transition assistance programs	ESRS S1 S1-1 §AR 17 (h)	Lyreco offers a wide range of training programs to enhance employee skills, including leadership development, digital skills, sustainability awareness, and role-specific competencies. Learning is delivered via our e-learning platforms, in-person workshops, and on-the-job training. Transition assistance is provided during organizational changes, including support for internal mobility, career counseling, and outplacement services when applicable. Individual development plans and regular performance reviews support long-term career growth. See also pages 49-50 "S1-1 Policies related to own workforce"				
	404-3 Percentage of employees receiving regular performance and career development reviews	ESRS S1 S1-13 §83 (a) and §84	All employees go through "Performance reviews" annually. In 2024, 88% completed the PDR process. Read more on pages 58-59 "S1-13 Training and skills development metrics".				
Diversity and equal opportunity				**4, 5, 8, 10**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §39, §42 (b) and (c) ESRS S1 §24 (a)	Diversity and Equality Policy, Code of Ethics, Equal treatment plan, employee and salary survey, diversity plan in recruitment and when choosing a supplier, reporting of misconduct is reported via whistleblower system.				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	ESRS 2 GOV-1 §21 (d); ESRS S1 S1-6 §50 (a); S1-9 §66 (a) to (b); S1-12 §79	Gender distribution board, Women: 29% Men: 71%. A total of 7 pers. Age distribution board, Under 30: 0% 30-50: 57%, over 50: 43% Gender distribution at top management level: 34% women, 66% men. Gender distribution all: 43% women, 54% men Age distribution all: Under 30: 13%, 30-50: 53%, over 50: 31%. See more on pages 56-57 "S1-9 Diversity metrics".				
	405-2 Ratio of basic salary and remuneration of women to men	ESRS S1 S1-16 §97 and §98	See page 60 "S1-16 Remuneration metrics (pay gap and total remuneration)".				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Non-discrimination				**5, 8**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); §24 (a) and (d); S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5 §39, §42 (b) and (c); ESRS S4 §10 (b); S4-1 §13; §16 (c); S4-2 §20; S4-4 §31; §32 (a) and (b); §35; §AR 30; §AR 33 (a); S4-5 §38; §41 (b) and (c)	Equal treatment plan, salary survey, diversity plan in recruitment and when choosing a supplier, reporting of misconduct is reported via whistleblower system				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	ESRS S1 S1-17 §97, §103 (a), §AR 103	No data / not included in the Report		406-1 b)	Not applicable	Data is not disclosed publicly due to confidentially concerns
Freedom of association and collective bargaining				**8**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); S2-2 §22; S2-4 §32; §33 (a) and (b); §36; §AR 33; §AR 36 (a); S2-5§39, §42 (b) and ©	Lyreco recognizes freedom of association and the right to collective bargaining as fundamental human rights. We adhere to international standards, including the UN Global Compact and ILO conventions. Our Code of Ethics and Supplier Code of Ethics require respect for these rights across our operations and supply chain. As part of our preparatory work for CSRD and CSDDD compliance, we monitor risks and practices related to these topics. We address requirements and follow-up from significant stakeholder groups (e.g. customers).				
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Freedom of association' and 'Collective bargaining' are sustainability matters for S1 and S2 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	See page 56 "S1-8 Collective Bargaining and Worker Representative".		407-1 a)	Information unavailable/ Incomplete	Overall information in the sustainability report. Detailed information at supplier level can be found in internal documents
Child Labor				**5, 8, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); §22; S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); §18; S2-2 §22; S2-4 §32; §33 (a)and (b); §36; §AR 33; §AR 36(a); S2-5 §39, §42 (b) and ©	UN Global Compact commitment; OECD Guidelines, Supplier Code of Ethics. See pages 49 "S1-1 Policies related to own workforce".				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Child Labor (following)				**5, 8, 16**			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	ESRS S1 §14 (g); S1-1 §22 ESRS S2 §11 (b); S2-1 §18	Lyreco has zero tolerance for child labour which is made visible in our Supplier Code of Ethics, we are aware of the increased risk of child labour that exists upstream in the value chain. Follow-up of our suppliers' Code of Conduct work is therefore part of our own follow-up. Read more under pages 49 "S1-1 Policies related to own workforce".		408-1 a - b)	Information unavailable/ Incomplete	Overall information in the sustainability report. Detailed information at supplier level can be found in internal documents
Forced and Compulsory Labor				**5, 8**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S1 S1-1 §17; §20 (c); §22; S1-2 §27; S1-4 §38; §39; §AR 40 (a); S1-5 §44; §47 (b) and (c); ESRS S2 §11 (c); S2-1 §14; §17 (c); §18; S2-2 §22; S2-4 §32; §33 (a)and (b); §36; §AR 33; §AR 36(a); S2-5 §39, §42 (b) and (c)	UN Global Compact commitment; OECD Guidelines, Supplier Code of Ethics. See pages 49 "S1-1 Policies related to own workforce".				
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	ESRS S1 §14 (f); S1-1 §22 ESRS S2 §11 (b); S2-1 §18	Lyreco has zero tolerance for forced labour, which is made visible in our governing documents. The risk of forced labour has been identified at the country level, such as China. No suppliers with a significant risk have been identified.		409-1 a - b)	Information unavailable/ Incomplete	Overall information in the sustainability report. Detailed information at supplier level can be found in internal documents
Security				**5, 8**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S3 §9 (b); S3-1 §12, and §16 (c); S3-2 §21; S3-4 §32 (a) to(d), §33 (a) and (b), §35, 36; §AR31, §AR 34 (a); S3-5 §39, §43	Security-related impacts are managed through clear procedures aligned with our Code of Ethics and human rights principles. We identify and assess potential risks linked to security operations, including the protection of communities' rights, and integrate these considerations into our contracts, policies, and training. Oversight is ensured through internal monitoring and due diligence processes.				
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Security-related impacts' is a sustainability matter covered for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/ or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	All security personnel, whether internal or contracted, are trained in human rights policies and procedures relevant to their duties. Training includes conduct expectations, proportional use of force, and respect for the rights of individuals, in line with our Code of Ethics and contractual requirements.				
Rights of Indigenous Peoples				**1, 2, 4, 16, 17**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S3 §9 (b); S3-1 §12, §15 and §16 (c); S3-2 §21; S3-4 §32 (a) to (d), §33 (a) and (b), §35, 36; §AR 31, §AR 34 (a); S3-5 §39, §43	No data / not included in the Report				
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	ESRS S3 S3-1 §16 (c), AR 12; S3-4 §30, §32 (b), §33 (b), §36	No data / not included in the Report				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Local communities				**1, 2, 4, 16, 17**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S3 §9 (b); S3-1 §12, and §16 (c); S3-2 §21; S3-4 §32 (a) to (d), §33 (a) and (b), §35, 36; §AR 31, §AR 34 (a); S3-5 §39, §43	UN Global Compact commitment, Supplier Code of Ethics.				
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	ESRS S3 S3-2 §19; S3-3 §25; S3-4 §AR 34 (c)	See "Lyreco for Education" on pages 61-62.				
	413-2 Operations with significant actual and potential negative impacts on local communities	ESRS 2 SBM-3 48 (c); ESRS S3 §9 (a) i and (b)	No data / not included in the Report		413-2 a)	Information unavailable/ Incomplete	Overall information in the sustainability report. Detailed information at supplier level can be found in internal documents.
Supplier Social Assessment				**5, 8, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-2 §12 and §15 (a)	UN Global Compact commitment, Supplier Code of Ethics, Sustainable Supplier Assessment.				
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	ESRS G1 G1-2 §15 (b)	All suppliers to Lyreco acknowledge our Code of Ethics as part of the contract process. Follow-up takes place according to set routines and processes. Read more on pages 68-69 "G1-2 Management of relationships with suppliers".				
	414-2 Negative social impacts in the supply chain and actions taken	ESRS 2 SBM-3 §48 (c) i and iv	No data / not included in the Report		414-2 a - e)	Information unavailable/ Incomplete	Overall information in the sustainability report. Detailed information at supplier level can be found in internal documents. Double materiality assessment for ESRS S2 in progress.
Political contributions				**5 ,8, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS G1 G1-5 §27	Not applicable				
GRI 415: Public Policy 2016	415-1 Political contributions	ESRS G1 G1-5 §29 (b)	See page 71 "G1-5 Political influence and lobbying activities".		415-1	Not applicable	No political contibutions in place.
Customer Health and Safety				**12, 13, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S4 §10 (b); S4-1 §13, §16 (c); S4-2 §20; S4-4 §31; §32 (a) and (b), §35, §AR 30, §AR 33 (a); S4-5 §38, §41 (b) and (c)	Lyreco has signed the UN Global Compact and follows the legal requirements of the Vigilance Law and the upcoming requirements for CSDDD. The OECD guidelines form the basis of our responsible business process. Applicable parts are also found for certification requirements within ISO 14001, ISO 9001. Group customer H&S internal procedure in place.				

GRI standard	Disclosure	ESRS disclosure requirements	Answer	Related SDGs	Omission		
General disclosures					**Requirement(s) omitted**	**Reason**	**Explanation**
Customer Health and Safety (following)				**12, 13, 16**			
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	'Personal safety of consumers and end-users' is a sustainability matter for S4 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	All suppliers to Lyreco acknowledge our Supplier Code of Ethics as part of the contract process. Risk assessment is carried out initially and then followed up according to set routines and processes. All Lyreco products are followed up based on applicable quality and safety aspects.				
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	ESRS S4 S4-4 §35	No reported incidents resulting in fines or warnings. Not included in this report.				
Marketing and labeling				**12, 16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S4 §10 (b); S4-1 §13, §16 (c); S4-2 §20; S4-4 §31; §32 (a) and (b), §35, §AR 30, §AR 33 (a); S4-5 §38, §41 (b) and (c)	In accordance with the requirements for ISO 9001 and ISO 14001 certification. Legal product requirements				
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Information-related impacts for consumers and end-users' is a sustainability matter for S4 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.	All Lyreco products are monitored based on applicable quality and labeling requirements. Products affected by the Toy Directive, food, technology and medical consumables are prioritized product categories for us. In addition, there are other third-party certifications such as the FSC, PEFC or Nordic Swan Ecolabel.		417-1 b)	Information unavailable/ Incomplete	Detailed information can be found in internal documents.
	417-2 Incidents of non-compliance concerning product and service information and labeling	ESRS S4 S4-4 §35	No reported incidents resulting in fines or warnings.				
	417-3 Incidents of non-compliance concerning marketing communications	ESRS S4 S4-4 §35	No reported incidents resulting in fines or warnings.				
Customer Privacy				**16**			
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS S4 §10 (b); S4-1 §13 and §16 (c); S4-2 §20; S4-4 §31, §32 (a) and (b), §35, §AR 30, §AR 33 (a); S4-5 §38, §41 (b) and (c)	Part of ISO 9001 structure in all Lyreco countries.				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	ESRS S4 S4-3 §AR 23; S4-4 §35	Nothing reported in 2024.				

ESRS E1 METRICS

Section E1-3: Achieved and expected GHG emission reductions

KPI ID	KPI name	Unit	2022	2023	2024
E1-3_03	Achieved GHG emission reductions (Scope 1 &2)*	tCO2e	-4863.10	-9768.13	-10732.09
E1-3_04	Expected GHG emission reductions (Scope 1 &2)*	tCO2e	not available	not available	-11560.00

*As we only have absolute reduction target on Scope 1 and 2, we exclude Sope 3 from this DPs.

Section E1-4: GHG emission reduction dimensions and intensity

KPI ID	KPI name	Unit	2022	2023	2024
E1-4_03	Absolute value of total Greenhouse gas emissions reduction	tCO2e	18059.97	-110987.73	-142496.29
E1-4_04	Percentage of total Greenhouse gas emissions reduction (vs base)	%	1	-6.1	-7.8
E1-4_05	Intensity value of total Greenhouse gas emissions reduction	kg CO_2e / €	0.01	-0.04	-0.05
E1-4_06	Absolute value of Scope 1 Greenhouse gas emissions reduction	tCO2e	-4228.63	-8234.15	-10102.01
E1-4_07	Percentage of Scope 1 Greenhouse gas emissions reduction (base)	%	-13.6	-26.5	-32.5
E1-4_08	Intensity value of Scope 1 Greenhouse gas emissions reduction	kg CO_2e / €	-0.0015	-0.0028	-0.0035
E1-4_09	Absolute value of location-based Scope 2 Greenhouse gas emission reduction	tCO2e	-634.47	-1533.98	-946.97
E1-4_10	Percentage of location-based Scope 2 GHG emission reduction (base)	%	-9.9	-23.8	-14.7
E1-4_11	Intensity value of location-based Scope 2 GHG emission reduction	kg CO_2e / €	-0.0002	-0.0005	-0.0003
E1-4_12	Absolute value of market-based Scope 2 GHG emission reduction	tCO2e	not available	not available	not available
E1-4_13	Percentage of market-based Scope 2 GHG emission reduction (base)	%	not available	not available	not available
E1-4_14	Intensity value of market-based Scope 2 GHG emission reduction	kg CO_2e / €	not available	not available	not available
E1-4_15	Absolute value of Scope 3 Greenhouse gas emissions reduction	tCO2e	22923.07	-101219.60	-131447.31
E1-4_16	Percentage of Scope 3 Greenhouse gas emissions reduction (base)	%	1.3	-5.7	-7.4
E1-4_17	Intensity value of Scope 3 Greenhouse gas emissions reduction	kg CO_2e / €	0.0082	-0.0339	-0.0451

Section E1-5: Energy consumption and sources

KPI ID	KPI name	Unit	2022	2023	2024
E1-5_01	Total energy consumption related to own operations	MWh	142431.1699	140650.74	131055.97
E1-5_02	Total energy consumption from fossil sources	MWh	120598.03	117272.33	107839.92
E1-5_03	Total energy consumption from nuclear sources	MWh	not available	not available	not available
E1-5_04	Percentage of energy consumption from nuclear sources in total energy consumption	%	not available	not available	not available
E1-5_05	Total energy consumption from renewable sources	MWh	21833.14	23378.41	23216.05
E1-5_06	Fuel consumption from renewable sources	MWh	not available	not available	not available
E1-5_07	Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	19160.24	21748.11	20180.45
E1-5_08	Consumption of self-generated non-fuel renewable energy	MWh	2672.89908	1630.3	3035.6
E1-5_09	Percentage of renewable sources in total energy consumption	%	15.3%	16.6%	17.7%
E1-5_09b	Percentage of renewable sources in total electricity consumption	%	54.9%	59.2%	61.6%
E1-5_10	Fuel consumption from coal and coal products	MWh	not available	not available	not available
E1-5_11	Fuel consumption from crude oil and petroleum products	MWh	90913.22	86588.62	78528.60
E1-5_12	Fuel consumption from natural gas	MWh	11733.80	14597.44	14814.77
E1-5_13	Fuel consumption from other fossil sources	MWh	not available	not available	not available
E1-5_14	Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	MWh	17951.01	16086.27	14496.55
E1-5_15	Percentage of fossil sources in total energy consumption	%	84.7%	83.4%	82.3%
E1-5_16	Non-renewable energy production	MWh	not applicable	not applicable	not applicable
E1-5_17	Renewable energy production	MWh	not available	not available	not available
E1-5_18	Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)	%	not available	not available	not available
E1-5_19	Total energy consumption from activities in high climate impact sectors	MWh	not available	not available	not available

Section E1-6: GHG emissions reports and disaggregation

KPI ID	KPI name	Unit	2022	2023	2024
E1-6_01	Gross Scope 1 GHG emissions	tCO2e	26832.23	22826.72	20958.86
	Gross Scope 2 GHG emissions (location-based)	tCO2e	5801.02	4901.51	5488.52
	Gross Scope 3 GHG emissions	tCO2e	1804172.68	1680416.56	1650188.85
	Total GHG emissions	tCO2e	1836805.933	1708144.79	1676636.232
E1-6_02	Gross Scopes 1, 2, 3 and Total GHG emissions - financial and operational control	tCO2e	not applicable	not applicable	not applicable
E1-6_03	Disaggregation of GHG emissions by country				
	Benelux	tCO2e	146,028.49	158,397.39	163,281.30
	CASH		33,513.97	27,822.28	31,509.90
	Denmark		61,255.14	59,433.72	60,304.91
	Elacin		682.51	659.02	528.82
	Finland		49,136.16	35,512.12	34,865.26
	France		381,254.52	322,858.34	307,039.76
	Germany		186,823.39	174,113.22	164,937.29
	Hong Kong		14,669.97	9,461.18	10,871.78
	Iberia		96,137.94	84,374.01	88,571.39
	Intersafe		435.72	453.30	861.43
	Italy		86,656.78	80,722.29	89,433.14
	Korea		11,406.84	9,682.07	9,043.03
	Lyreco Management		7,432.53	5,448.96	5,269.93
	Norway		141,076.97	121,141.37	116,014.76
	Poland		66,871.47	51,741.24	58,340.96
	SiMa		22,256.55	20,140.05	28,067.85
	Sweden		162,696.81	156,049.58	133,441.34
	Switzerland		137,885.00	149,617.46	118,962.38
	Thailand		19,190.70	18,529.11	21,593.06
	WISE		211,394.51	221,988.09	233,697.94

KPI ID	KPI name	Unit	2022	2023	2024
E1-6_04	Gross Scope 1 GHG emissions (GHG protocol)	tCO2e	26832.24	22826.72	21275.75
	Gross Scope 2 GHG emissions (location-based) (GHG protocol)	tCO2e	5801.02	4901.51	5488.52
	Gross Scope 2 GHG emissions (market-based) (GHG protocol)	tCO2e	not available	4847.93	3418.71
	Gross Scope 3 GHG emissions (GHG protocol)	tCO2e	1804559.23	1680416.56	1650188.85
	Total GHG emissions (GHG protocol)	tCO2e	1837192.49	1708144.79	1676953.12
E1-6_05	Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 (ISO 14064-1)	tCO2e	not applicable	not applicable	not applicable
E1-6_06	Gross Scopes 1, 2, 3 and Total GHG emissions - total value chain	tCO2e	not applicable	not applicable	not applicable
E1-6_07	Gross Scope 1 greenhouse gas emissions	tCO2e	26832.24	22826.72	21275.75
E1-6_08	Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	not applicable	not applicable	not applicable
E1-6_09	Gross location-based Scope 2 greenhouse gas emissions	tCO2e	5801.02	4901.51	5488.52
E1-6_10	Gross market-based Scope 2 greenhouse gas emissions	tCO2e	not available	4847.93	3418.71
E1-6_11	Gross Scope 3 greenhouse gas emissions	tCO2e	1804559.23	1680416.56	1650188.85
E1-6_12	Total GHG emissions location based	tCO2e	1837192.49	1708144.79	1676953.12
E1-6_13	Total GHG emissions market based	tCO2e	not available	1708091.21	1674883.31

ESRS E1 metrics

Section E1-6: Characteristics of the undertaking's employees

KPI ID	KPI name	2022	2023	2024
S1 6_01	Total number of employees by headcount and gender	Female 4 529 Male 5 723 Other / Non-reported 269	Female 4 523 Male 5 696 Other / Non-reported 276	Female 4 524 Male 5 691 Other / Non-reported 395
S1 6_01b	Gender distribution in percentage of employees	Female 43% Male 54% Other / Non-reported 3%	Female 40% Male 56% Other / Non-reported 4%	Female 43% Male 54% Other / Non-reported 3%
S1 6_02	Total number of employees (head count)	10521	10491	10610

KPI ID	KPI name	2022	2023	2024
S1 6_03	Average number of employees (head count)	not available	not available	10540
S1 6_04	Employees in countries ≥50 employees representing ≥10% of total (by head count)	France 2002 WISE 1415	France 2007 WISE 1431	France 1978 WISE 1373
S1 6_06	Average head count in those significant countries	France 2002 WISE 1415	France 2007 WISE 1431	France 1 980 WISE 1 398
S1 6_11	Number of employees who have left the undertaking during the reporting period	2129	1845	1880
S1 6_12	Employee turnover rate (%)	20.25%	17.07%	17.72%
S1 6_19	Number of full time employees (head count or FTE)	not available	not available	9 400
S1 6_20	Number of part time employees (head count or FTE)	not available	not available	800

S1-7: Non employees in own workforce

KPI ID	KPI name	2022	2023	2024
S1 7_01	Number of non employees (total contingent workers)	67	182	283
S1 7_02	Number of non employees: self employed/ consultant	not available	not available	119
S1 7_03	Number of non employees: provided by employment service providers	not available	not available	114

S1-8: Collective bargaining and social dialogue

KPI ID	KPI name	2022	2023	2024
S1 8_01	% of employees covered by collective bargaining agreements	not available	not available	52%
S1 8_01	% of countries with a collective agreement in place	not available	68%	67%
S1 8_02	% of employees covered by CBA in EEA countries	not available	France: 100% (2 007/2 007); WISE: n/a	France: 100% (1 978/1 978)
WISE: n/a				
S1 8_03	% of employees covered by CBA outside the EEA	0%	0%	0%
S1 8_06	% of employees in EEA countries covered by workers' representatives	not available	not available	France: 44 employees WISE: 0 employees

KPI ID	KPI name	2022	2023	2024
S1 8_08	% of employees outside the EEA countries covered by collective bargaining and social dialogue agreements by coverage rate and by region	not available	not available	not available

S1-9 to S1-11: Diversity, Age, Social Protection

KPI ID	KPI name	2022	2023	2024
S1 9_01	Gender distribution in number of employees (head count) at top management level	not available	not available	Female: 58 Male: 109
S1 9_02	Gender distribution in percentage of employees at top management level	30.50%	34.20%	34.68%
S1 9_03	% of employees under age 30	not available	not available	12.94%
S1 9_04	% of employees aged 30–50	not available	not available	52.77%
S1 9_05	% of employees over age 50	not available	not available	30.09%
S1 11_06	Coverage of social protection by country and type	not available	not available	100%
-	Total hours of training on DEI, harassment and discrimination	not available	392	2421

S1-12: Persons with disabilities

KPI ID	KPI name	2022	2023	2024
S1 12_01	Number of employees with disabilities (subject to legal data restrictions)	not available	not available	223 employees across Group (Sweden, Finland, Benelux are not legally allowed to keep records of this information - data excluded)
S1 12_01	% of employees with disabilities (subject to legal data restrictions)	not available	not available	not available

S1-13: Training & skills development

KPI ID	KPI name	2022	2023	2024
S1 13_01	% training hours by gender (female/male)	not available	not available	Female 44% Male 56%
S1 13_02	% of employees who participated in regular performance & career development reviews	not available	100%	87.83%
S1 13_04	Average number of training hours per employee	13.8 hours	17.10 hours	18.03 hours

S1-14: Health & Safety

KPI ID	KPI name	2022	2023	2024
S1 14_01	% of own workforce covered by health & safety management systems	99%	94.40%	96.0%
S1 14_02	Number of fatalities in own workforce due to work related injuries or ill health	0	0	0
S1 14_03	Number of fatalities of other workers on undertaking's sites	0	0	0
S1 14_04	Total number of recordable work related accidents (own workforce)	not available	191	212
S1 14_05	Lost Time Injury Frequency Rate	4.0	11.8	13.2
S1 14_05	Lost Time Injury Severity Rate	0.7	0.4	3.8
S1 14_07	Number of days lost due to work related injuries, ill health, and fatalities	not available	6379.5	61043.4
S1 14_07	Total number of hours worked	not available	16,138,360.19	16,041,982.77
S1 14_10	% of workforce covered by externally audited or certified health & safety management systems (e.g., ISO 45001)	not available	35%	40%
-	Percentage of all operational sites for which an employee health & safety risk assessment has been conducted	not available	89.8%	90%
-	Percentage of total workforce across all locations who received training on H&S issues	not available	43.5%	44.9%

S1-15: Work life balance

KPI ID	KPI name	2022	2023	2024
S1 15_01	% of employees entitled to family related leave	not available	not available	94.40%

KPI ID	KPI name	2022	2023	2024
S1 13_01	% training hours by gender (female/male)	not available	not available	Female 44% Male 56%
S1 13_02	% of employees who participated in regular performance & career development reviews	not available	100%	87.83%
S1 13_04	Average number of training hours per employee	13.8 hours	17.10 hours	18.03 hours

S1-14: Health & Safety

KPI ID	KPI name	2022	2023	2024
S1 14_01	% of own workforce covered by health & safety management systems	99%	94.40%	96.0%
S1 14_02	Number of fatalities in own workforce due to work related injuries or ill health	0	0	0
S1 14_03	Number of fatalities of other workers on undertaking's sites	0	0	0
S1 14_04	Total number of recordable work related accidents (own workforce)	not available	191	212
S1 14_05	Lost Time Injury Frequency Rate	4.0	11.8	13.2
S1 14_05	Lost Time Injury Severity Rate	0.7	0.4	3.8
S1 14_07	Number of days lost due to work related injuries, ill health, and fatalities	not available	6379.5	61043.4
S1 14_07	Total number of hours worked	not available	16,138,360.19	16,041,982.77
S1 14_10	% of workforce covered by externally audited or certified health & safety management systems (e.g., ISO 45001)	not available	35%	40%
-	Percentage of all operational sites for which an employee health & safety risk assessment has been conducted	not available	89.8%	90%
-	Percentage of total workforce across all locations who received training on H&S issues	not available	43.5%	44.9%

S1-15: Work life balance

KPI ID	KPI name	2022	2023	2024
S1 15_01	% of employees entitled to family related leave	not available	not available	94.40%
S1 15_02	% of entitled employees who took family related leave (with gender breakdown)	not available	not available	10.5% (F 55.5% / M 44.5%)

KPI ID	KPI name	2022	2023	2024
S1 15_02	% of entitled employees who took family related leave (with gender breakdown)	not available	not available	10.5% (F 55.5% / M 44.5%)

S1-16: Remuneration metrics

KPI ID	KPI name	2022	2023	2024
S1 16_01	Gender pay gap (%)	not available	12.53%**	12.35%**
S1 16_02	Ratio of highest-paid individual to median employee remuneration	not available	not available	not available

**proxy data based on Eurostat statistics

ESRS E1 metrics

G1-3 to G1-4: Corruption and bribery

KPI ID	KPI name	2022	2023	2024
G1-3_07	Percentage of functions-at-risk covered by training programmes	not available	not available	84.40%
G1-4_01	Number of convictions for violation of anti-corruption and anti- bribery laws	0	0	0
G1-4_03	Percentage of total workforce trained on business ethics issues	not available	41%	21%
G1-4_03	Hours of training for workforce on business ethics issues	not available	not available	2,860.25
G1-4_04	Number of confirmed incidents of corruption or bribery	0	0	0
G1-4_06	Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0	0	0
G1-4_07	Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0	0	0

Appendix III: Index of ESRS disclosure requirements (IRO-2)

Disclosure Requirement (DR)	Title	Location in Report / Section title	Cross-reference to GRI standard	Comment
ESRS 2 BP-1	General basis for preparation	Sustainability Statement pp. 10–11 @	GRI 2-1, 2-4	Outlines reporting scope and application of CSRD and ESRS.
ESRS 2 BP-2	Disclosures in relation to specific circumstances	Sustainability Statement p. 11	GRI 2-3	Explains changes in presentation of sustainability information.
ESRS 2 GOV-1	Role of administrative, management, and supervisory bodies	Governance pp. 12–13	GRI 2-9	Describes GET's sustainability oversight.
ESRS 2 GOV-2	Sustainability matters addressed by governance bodies	Governance pp. 12–13	GRI 2-13, 2-14	Includes quarterly updates, risk review, and alignment with ESG strategy.
ESRS 2 GOV-3	Sustainability-related performance in incentive schemes	Governance p. 13	GRI 2-19	Sustainability KPIs integrated into bonuses and evaluations.
ESRS 2 GOV-5	Risk management and internal controls	Governance p. 15	GRI 2-23	Covers internal systems and data assurance processes.
ESRS 2 SBM-1	Strategy, business model and value chain	Strategy pp. 16–18	GRI 2-6	Includes GREAT2026 strategy, product portfolio, and value chain coverage.
ESRS 2 SBM-2	Interests and views of stakeholders	Stakeholders pp. 19–21	GRI 2-29, 3-3	Stakeholder engagement mapped by group and method.
ESRS 2 SBM-3	Material impacts, risks and opportunities	Materiality pp. 22–24	GRI 3-1, 3-2	Identifies climate, business conduct, and workforce as material.
ESRS 2 IRO-1	Description of the materiality assessment process	Materiality Assessment pp. 25–26	GRI 3-1, 3-2	Double materiality based on 112 IROs evaluated.
ESRS E1-1 to E1-7	Climate change (transition plan, targets, emissions)	Planet pp. 29–41	GRI 302, 305	Fully disclosed; SBTi targets and Scope 1–3 emissions included.
ESRS S1-1 to S1-15	Own workforce (diversity, health, training, non-employees)	People pp. 48–65	GRI 401–405	Includes data on working conditions, well-being, and diversity.
ESRS G1-1 to G1-6	Business conduct (ethics, corruption, lobbying, payments)	Progress pp. 66–77	GRI 205, 206, 307	Includes due diligence, whistleblower protections, and anti-corruption.
ESRS E2, E3, E5, S2–S4	Pollution, water, circular economy, workers in value chain, etc.	Not yet reported	GRI 301, 303, 305, 408, 411, 416	Materiality assessment in progress; disclosures expected in future cycles.

List of material DRS	Paragraph or page reference
ESRS 2 - General Disclosures	Pages 9-26
BP-1 General basis for preparation of the sustainability statement	Page 10
BP-2 Disclosures in relation to specific circumstance	Pages 10-12
GOV-1 The role of the administrative, management and supervisory bodies	Pages 12-13
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Pages 13-14
GOV-3 Integration of sustainability-related performance in incentive schemes	Page 14
GOV-4 Statement on due diligence	Page 15
GOV-5 Risk management and internal controls over sustainability reporting	Page 16
SBM-1 Strategy, business model and value chain	Pages 17-19
SBM-2 Interests and views of stakeholder	Pages 20-23
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business mode	Pages 23-24
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	Pages 25-26
IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	Page 26
E1 - Climate change	Pages 27-44
ESRS 2 GOV-3-E1 Integration of sustainability-related performance in incentive schemes	Pages 14 and 30
E1-1 Transition plan for climate change mitigation	Pages 29-32
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ASSURANCE STATEMENT

SGS POLSKA SP. Z O.O.'S REPORT ON 8 (EIGHT) INDICATORS FOR 2024 SELECTED BY LYRECO SAS

NATURE OF THE ASSURANCE/ VERIFICATION

SGS Polska Sp. z o.o. (hereinafter referred to as SGS) was commissioned by Lyreco SAS (hereinafter referred to as Lyreco) to conduct an independent assurance of selected by Lyreco on 28.03.2025 indicators for 2024.
As a final result, 8 (eight) indicators were asurred. Verification process was performed on the base of data provided by Lyreco on data sheets extracted form Lyreco systems. 2024 Sustainability Report or Draft of the report weren't provided during verification process as the report itself was out of assurance scope.

INTENDED USERS OF THIS ASSURANCE STATEMENT

This Assurance Statement is provided with the intention of informing all Lyreco's Stakeholders.

RESPONSIBILITIES

The information in the Report and its presentation are the responsibility of the directors or governing body and the management of Lyreco. SGS has not been involved in the preparation of any of the material included in the Report.

Our responsibility is to express an opinion on the text, data, graphs and statements within the scope of verification (8 indicators selected by Lyreco) with the intention to inform all Lyreco's stakeholders.

ASSURANCE STANDARDS, TYPE AND LEVEL OF ASSURANCE

Assurance Standard Options		Level of Assurance
A	SGS ESG & SRA Assurance Protocols (based on GRI Principles and guidance in AA1000)	n/a

SCOPE OF ASSURANCE AND REPORTING CRITERIA

The scope of the assurance included evaluation of quality, accuracy and reliability of specified performance information. In accordance to Lyreco testimonies the Sustainability Report 2024 is prepared in line with CSRD, partially addressing ESRS requirements. Indicators selected by Lyreco, firstly to monitor progress toward Great Impact Strategy (sustainability strategy) and among others on the purpose of EcoVadis Assessment.

SPECIFIED PERFORMANCE INFORMATION AND DISCLOSURES INCLUDED IN SCOPE

Scope of the verification included independent assurance of 8 (eight) indicators for 2024 selected by Lyreco on 28.03.2025. Lyreco has defined the reporting period as full calendar year 2024 for all selected indicators:

1. Lost time injury (LTI) SEVERITY rate for direct workforce;
2. Lost time injury (LTI) FREQUENCY rate for direct workforce;
3. Percentage of total employees covered by collective bargaining agreements;
4. Percentage of employees that participated in regular performance and career development reviews;
5. Gender distribution in percentage of employees at top management level;
6. Percentage of employee turnover;

7. Number of confirmed incidents of corruption or bribery;
8. Prevention and detection of corruption or bribery - anti-corruption and bribery training table.

ASSURANCE METHODOLOGY

The assurance performed comprised the review, evaluation of and providing comments on the data collection processes and the accuracy of the indicators. This included the following activities:

• Desk study of procedures and related documents;
• Evaluation of data collection processes and accuracy of collected data;
• Evaluation of 8 indicators selected by Lyreco;
• Interviews carried out with main persons responsible on client's side for data collection and analysis (based in different locations; interviews conducted remotely via MS Teams) to complete the evaluation of data collection processes and accuracy of reported information and data, including:

- • Interviews with relevant personnel,
- • Document and record inspection,
- • Confirmation of information sources.

LIMITATIONS AND MITIGATION

- Assurance process was performed remotely on MS Teams – 08.04.2025 with Lyreco Germany, 09.04.2025 with Compliance team, 24.04.2025 with Lyreco Iberia, 25.04.2025 with Lyreco Thailand and on 28.04.2025 with P&C department, additionally e-mails exchange was used;
- The assurance was based on sustainability KPIs provided by the Lyreco. The Sustainability Report 2024 was not included in the assurance scope.

STATEMENT OF INDEPENDENCE AND COMPETENCE

The SGS Group of companies is the world leader in inspection, testing and verification, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social and ethical auditing and training; environmental, social and sustainability report assurance. SGS affirm our independence from Lyreco SAS, being free from bias and conflicts of interest with the organisation, its subsidiaries and stakeholders.

The assurance team was assembled based on their knowledge, experience and qualifications for this assignment, and comprised auditors with expertise in ESG fundamentals, Social Auditing, OHS Systems, Information Security and Data Quality.

FINDINGS AND CONCLUSIONS

ASSURANCE/VERIFICATION OPINION

On the basis of the methodology described and the verification work performed, nothing has come to our attention that causes us to believe that the specified performance information included in the scope of assurance is not accurate, reliable or has been not fairly stated in terms of 8 indicators below:

1. Lost time injury (LTI) SEVERITY rate for direct workforce;
2. Lost time injury (LTI) FREQUENCY rate for direct workforce;
3. Percentage of total employees covered by collective bargaining agreements;
4. Percentage of employees that participated in regular performance and career development reviews;
5. Gender distribution in percentage of employees at top management level;
6. Percentage of employee turnover;
7. Number of confirmed incidents of corruption or bribery;
8. Prevention and detection of corruption or bribery - anti-corruption and bribery training table.

Summary of the final version of assured KPI figures:

No.	KPIs	Reporting period	KPI Value	Status
1	Lost time injury (LTI) SEVERITY rate for direct workforce	Jan - Dec 2024	**3,8**	Assured
2	Lost time injury (LTI) FREQUENCY rate for direct workforce	Jan - Dec 2024	**13,2**	Assured
3	Percentage of total employees covered by collective bargaining agreements	Jan - Dec 2024	**52%**	Assured
4	Percentage of employees that participated in regular performance and career development reviews	Jan - Dec 2024	**87%**	Assured
5	Gender distribution in percentage of employees at top management level	Jan - Dec 2024	**34,68%**[1]	Assured
6	Percentage of employee turnover	Jan - Dec 2024	**17,72%**	Assured
7	Number of confirmed incidents of corruption or bribery	Jan - Dec 2024	**0** [2,3]	Assured
8	Prevention and detection of corruption or bribery - anti-corruption and bribery training table	Jan - Dec 2024	**21%**	Assured

[1] KPI (Gender distribution in percentage of employees at top management level) value can vary +- 1,9% due to lack of 1,9% of raw data

[2] KPI (Number of confirmed incidents of corruption or bribery) calculation do not include the number of anonymous alerts which are not registered and not proceeded by the company

[3] KPI (Number of confirmed incidents of corruption or bribery) calculation do not include the number of local alerts at the Subsidiaries level, proceeded out of “Raise your concern” tool.

QUALITY AND RELIABILITY OF SPECIFIED PERFORMANCE INFORMATION

During the verification process some examples of opportunities for improvement in underlying processes were identified and reported to Lyreco with the aim of enabling a process of continual improvement in collection and reporting KPI data during future reporting cycles:

Opportunities for improvements:

- Reconfirm understanding by designated responsible persons for processes of data collection (methods, tools) and indicators calculation on global and local levels;
- Strengthen the ongoing data collection and monitoring process;
- Review and update existing procedures in terms of details mentioned above in each indicator section;
- The information about conditions influencing on particular KPI’s values (mentioned in the report) must to be revealed together with published KPIs.

For and on behalf of SGS Polska Sp. z o.o.

Zbigniew Suchodolski – Business Manager of Business Assurance Division

Z. Suchodolski

Gdynia, Poland

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