



CORPORATE SOCIAL RESPONSIBILITY REPORT, 2021

ACO NORDIC GROUP A/S



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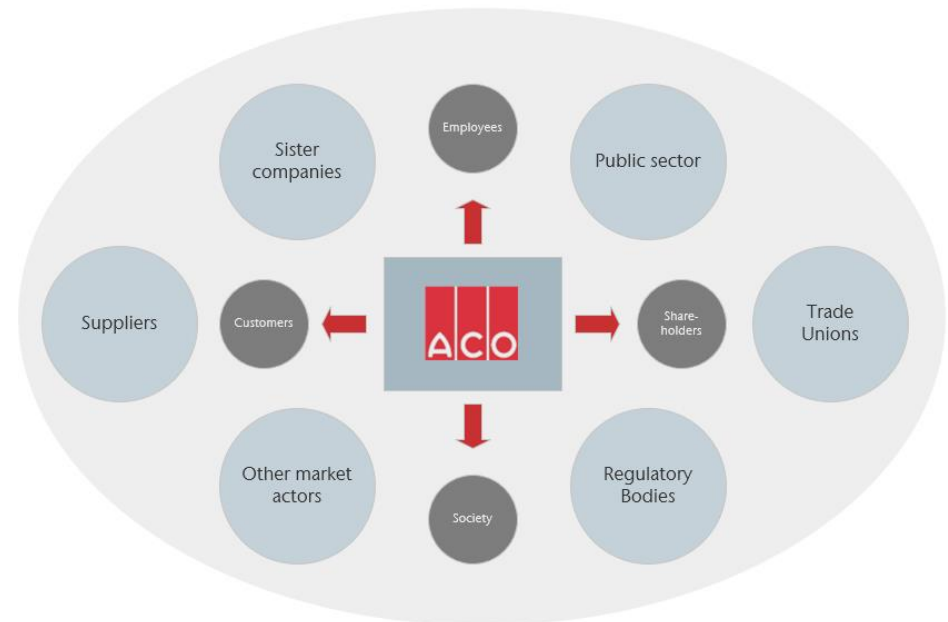
About this report

All the affiliates belonging to the ACO Nordic Group A/S, as well as the holding company itself, prepare their yearly statutory reports on a basis of natural years (January 1st to December 31st). The Corporate Social Responsibility report for 2021 carries on with the commitment we started three years ago on being transparent about our vision and strategies in this area.

This sustainability report has been prepared in accordance with the GRI Standards: Core option and will be annexed to the financial statements for ACO Nordic Group A/S for the 2021 exercise, covering the requirements of the Danish Financial Statements' Act, in terms of Corporate Social Responsibility reporting (section 99a) and gender equality (section 99b). Based on the work KPMG performed on the financial statements for ACO Nordic Group A/S for 2021, KPMG conclude that the management commentary is in accordance with the requirements of the Danish Financial Statements Act. They did not identify any material misstatement of the management commentary. It will be possible to be downloaded from <http://www.aco.dk/om-aco/csr/> and other ACO Nordic websites.

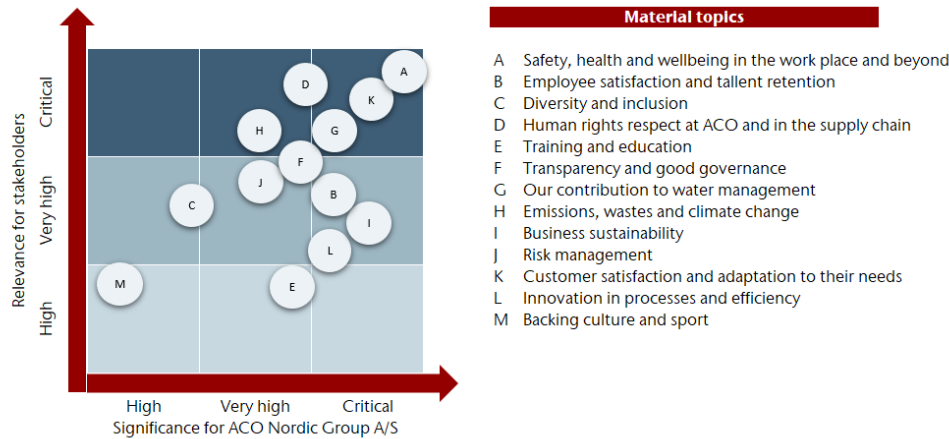
The content of this report, unless specified otherwise in the corresponding section, applies to the ACO Nordic Group A/S and the totality of its affiliates as well.

Respecting the reporting principles of the GRI 101 standard we have first been reflecting about our stakeholder's responsibility, creating the here enclosed map, where shareholders, employees, customers, and the extended beneficiaries of the ACO solutions for surface water management and building drainage are at the core.



The content, structure and scope of this report was determined through a process of internal and external reflection, which made it possible to identify and prioritize matters with a greater impact and importance for the business and/or stakeholders.

Materiality Matrix



From the overall assessment of the critical matters for each stakeholder and the most significant aspects for business activity, the top management at ACO Nordic Group A/S decided to concentrate in the list enclosed.

The relation between those material topics and the Danish financial authorities' requirements, as well as the corresponding GRI standards can be found in the appendix 1, table 3.

Message from the CEO

Writing about 2021 business environment and ACO Nordic Group A/S performance, while we are closing our financial statements now in April 2022, feels like a time-traveling exercise, considering that the beginning of the year has been eclipsed by the Russian invasion of Ukraine.

However, 2021 has been quite a relevant, even pivotal, year on our approach to sustainability, where we have made conscious efforts to move from doing “right things” to co-create with our employees a sustainability mission umbrella, that can give them sense, as well as provide a clear frame for the future to make the “the right things in the right way”, paying attention not only to the critical role that we must play, with our products and solutions on Stormwater Treatment, but also the way we manufacture our products and carry our commercializing operations, so they provide the best possible outcome for all our stakeholders.

We believe that transformations have greater chances of success if driven from inside, rather than as a reaction to legislation or market pressures, so we have prompted our employees to provide their input on how to make our operations and our products a better contribution for the environment on our first edition of the “ACO Nordic Group A/S sustainability contest”. All employees across the Nordic geography participated with ideas categorized on Reduce (scarce resources consumption), Recycle (waste), Refuse

(work only with suppliers that support us to have a sustainable supply chain), Repair (the ecosystem when it is damaged), Reuse (resources instead of disposing them after 1 use) and Rethink, following the 6R model for circular economies.

We also involved our employees and management in different workshops, through 2021, to define, together, what will be our approach to sustainability and the conclusion was a roadmap until 2025 where we will focus on:

- Stakeholder engagement to support our sustainability journey.
- Accelerate the turnover on the part of our portfolio more related to the environment care, especially on our core business: water care.
- Not limiting our positive contribution to Net Zero, but study cases for energy saving and resourcing with the potential even for positive contribution to GHG emissions.
- Document and certify our efforts as a sign of our commitment with making our future compatible with the earth and its natural resources and biodiversity.
- Adapt the organizational structure to ensure that sustainability has its place at strategic, but also at tactic level.

- Align our commitment with the UN Sustainable Development Goals, choosing the goals in which we can contribute and ensuring we reach it.

At ACO Nordic, the year 2021 was eventful on celebrations. First, we congratulated our colleague Kestutis Jokubauskis in Lithuania for his 25 years of impressive track record with ACO, at the same time he celebrated his 50th birthday.

In August, Covid-19 restrictions were lifted in most of the markets where we operate and in our offices. After more than one year where colleagues were meeting only through video conferencing, it was an emotive reunion moment that deserved to be celebrated, and so we did.

2021 was also a memorable year for the ACO Group, as while we celebrated the 75th anniversary of its creation, we were reaching our targeted turnover of 1 billion Euros, fulfilling our multiyear objective ONE21.

As always, through the next pages we try to open, for every interested reader, our company culture and mindset, so it is understandable what, besides financial performance, we try to achieve as a proactive part of the society and the environmental ecosystem. In case you would like to leave us some comment or suggestion, please do not hesitate to contact us at:

csr-nordic@aco.local



1.1.- ACO Nordic Group A/S background and structure

ACO Nordic Group A/S is part of the ACO Group, which was founded in 1946 by Josef-Severin Ahlmann in Büdelsdorf, in the state of Schleswig-Holstein, northern Germany. Initially focused on building materials, since the 1960s the backbone of the company's growth turned to be designing, manufacturing, and developing drainage products and systems. The wide range of ACO Group products' portfolio has enabled us to deliver services and solutions in accordance with our customer's needs.

ACO Nordic group A/S has 100% shareholdings on several companies in Denmark, Sweden, Norway, Finland and the Baltic republics and its own shares are 100% ownership of the Ahlmann family through the ACO group holding (see table 1 in the appendix area for full legal structure). All of them have the legal form of limited liability companies. In the map here besides, the location of the different offices and factories is indicated.

The headquarters of the "Nordic subgroup" are placed in Ringsted, Denmark, which holds the managerial responsibility over all the companies owned by the ACO Nordic Group A/S, except the 2 factories in the north of Denmark (Hvidbjerg and Nors). On the other hand, it has managerial responsibilities in ACO Sp. z o.o. the ACO affiliate in Poland despite not being its shareholder.



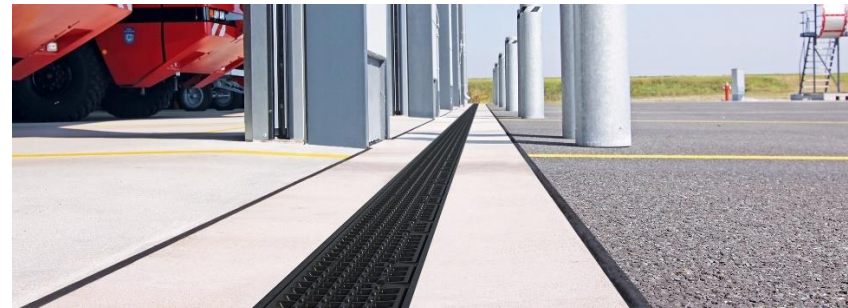
1.2.- The activities carried by the ACO Nordic Group A/S and its business model

There are approximately 360 employees working for the ACO Nordic Group A/S and its affiliates. While Hvidbjerg and Plastmo have their own production sites and they both produce and commercialize their goods in the Nordic subgroup markets, the ACO affiliates are limited to marketing and commercialization activities of goods produced by the ACO Group in other sites outside the Nordic Subgroup. The ACO affiliates in the Nordic subgroup, commercialize products manufactured mainly on ACO factories based in Germany, Czech Republic, and Poland.

Exports outside the Nordic markets are limited and mostly linked to Plastmo serving Russian and Ukrainian customers. Exports to other markets are possible but seldom, following the ACO philosophy of letting the local affiliates take care of the local market needs.

The ACO Nordic Group, provides, with the mentioned resources, not only products and services, but focuses on providing integrated solutions for the problems presented by water and the need of its adequate management in different circumstances. In most of the cases, our value chain goes through our business partners: the wholesalers, the builders' merchants and the "do-it-yourself" shops or chains of shops.

Our own consultants will support the projects requiring a higher profile of knowhow, helping on the design of the solution, training on the use and management of the products and following up from the inception to the building phase the construction project.



During the construction, the project management where we participate, we may be interfacing with construction companies, installers, engineers, architects or even the sponsoring actors as part of the decision-making process on the project. However, it is our policy to prioritize physical and financial flows through the mentioned business partners (re. section 1.5 on risk management).

1.3.- The ACO Nordic group A/S offer portfolio

The product portfolio is structured around the system chain to manage the water.



Following the philosophy of the EU Water Framework Directive, which states that “Water is not a commercial product like any other but, rather, a heritage which must be protected, defended and treated as such” our product portfolio offer solutions in urban environments to support the collection of stormwater, its cleaning from different pollutants (oil, heavy metals, sediments, etc.), its buffering retention, in case of extreme rain events in urban areas, to avoid flooding damages and also its potential reuse, for example to water close by vegetation.

Indoors, we apply the same philosophy and still have products and services to cover the needs of collecting and pre-treating water in environments as exigent as the food processing industry or commercial kitchens, where hygiene is prioritized to protect final consumers’ health.

Our product range is commercialized in the Nordic subgroup under the brands ACO, Plastmo and Hvidbjerg.

ACO products are mostly dedicated to the Surface Water Management and to the Building Drainage segments; Plastmo products are mostly focused to manage the rain from the sky to the ground around the house (rain gutters, roofing materials, water infiltration solutions, rain flow regulation for the garden, rainwater storage and recycling, etc); while Hvidbjerg is mainly focused on windows.

To ensure a responsible lifecycle management on the products using PVC in our Plastmo portfolio, the ACO Nordic Group A/S owns, as well, 20% shares in Wuppi A/S, a Danish company which business model is to recover and recycle PVC.

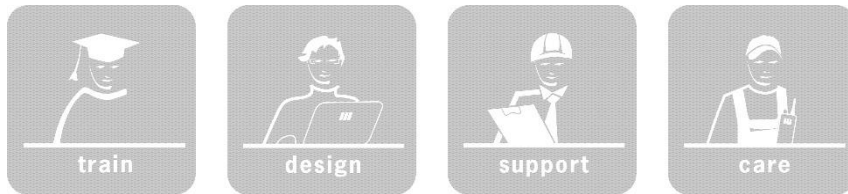
More details about our offered portfolio can be found on our local websites or at ACO group:

<https://www.aco.com/en/products-and-services/>

<https://www.plastmo.dk/>

<https://www.hvidbjergvinduet.com/>

In our cooperation with our business partners and customers, we also provide useful services that support the process of managing complex construction projects where multiple parts must be coordinated (wholesalers, entrepreneurs, constructors, installers, engineers, architects, etc).



The extensive portfolio of products and services offered, allow us to be present in the construction of residential and non-residential buildings as well as in civil engineering projects, both new and renovating constructions.

1.4.- Major structural changes during 2021 for the ACO Nordic Group A/S

During 2021, there were no changes on the scope of this document in terms of mergers, acquisitions, or company divestments.

1.5.- Risk management and business sustainability

The ACO Nordic Group, as one of the actors in the construction market, has identified and reacted in different ways to the risks here below mentioned. We understand risk is inherent to business; therefore, our approach is that risk avoidance is not always the optimal answer and to ensure the business sustainability on a long run requires a deep understanding of the nature of the risk, its probability, and the potential impacts in terms of economic performance, social repercussions, and environmental consequences. From that point of view, we have reached the following conclusions:

Credit risk: as part of the economic cycles, the construction sector suffers during its valley periods of recurrent bankruptcies of construction companies, which put in danger the profitability and business continuity of all other upstream contributors (wholesalers and producers). In that sense, ACO Nordic Group has adopted a policy of ensuring the credit risk, despite a rather positive history and a business environment in most of the markets in which we operate which are both, healthy in the levels of indebtedness and have good records on debt repayment.

As we are concluding this report, we start seeing some cases of construction projects postponed by the sudden

inflation on raw materials or directly its cancellation, despite of severe penalties involved.

Naturally, we hope the Russian invasion of Ukraine finishes soon and the business environment will get restabilized, but our strict respect of the credit risk policy makes us also ready for turbulences that could manifest on the form of liquidity issues of our commercial partners or their customers.

Currency exchange risk: The ACO Nordic Group A/S consolidates' its financial statements in Danish Kroner and is therefore exposed to the fluctuations of any other currencies bringing cash inflows (Swedish and Norwegian Kroner and Polish Zloty) or outflows (mainly Eurozone suppliers). In that sense, the ACO Nordic Group A/S has a centralized policy to hedge the currency exchange risk against fluctuations in SEK, NOK and PLN. The DKK remains pegged to the EUR with fluctuation bands of +/- 2.25% around a central exchange of 7.46038 DKK/EUR, for which we have decided not to hedge the risk on EUR currency.

Liquidity risk: ACO Nordic Group has a consolidated equity-to-assets' ratio of 62% which is considered very healthy and count currently with credit facilities granted mainly through our Nordic banking partners: Danske Bank and Nordea. Our operations in Poland are also supported through Mbank, affiliate of Commerzbank.

Market risk: As mentioned before, the construction market has very pro-cyclical characteristics, with profound impacts on the activity level, forcing all the competitors to be reactive in terms of pricing, organizational structure and having always to ensure maximal operational efficiency. In this sense, the ACO Nordic Group has been working during the recent, positive market conjuncture, years to modernize our IT systems and be as close as possible to our customer needs, in order to sense, as soon as possible, changes on market trends.

During the Covid-19 crisis we succeeded to adapt our operational expenses on such a swift manner that the profit of the ACO Nordic Group A/S has grown despite of the market turbulences and uncertainties.

The war in Ukraine is bringing to the construction market higher energy and raw material prices as well as supply chain disruptions. So far, it has been accepted by the final customers which are assuming a higher cost for their projects and therefore we keep our commercial operations unchanged. Would demand fall, our organization and operations should adapt to the new market conditions.

Operational risks: We know that human intervention is prone to mistakes, so we continuously work on the balancing the efficiency on the operations with the limitation of the risk of misstatements and fraud. The target is not only linked to the financial statements, but more generally to

the execution of the operations carried in by the ACO Nordic Group A/S and its affiliates.

Energy risks: Prices of energy and fossil energy sources have been rising since the aftermath of the first covid-19 waves as quick global demand recovery was overwhelming the existing supply. The Russian invasion of Ukraine and the corresponding EU sanctions against Russia are adding just more pressure to the petrol and gas. As a measure to reduce ACO Nordic A/S exposure to this risk we are accelerating all the initiatives and investments in the direction of: a) reducing energy consumption; b) reducing exposure to fossil fuel sources and therefore reduce our GHG footprint (see section 6 for more information on our GHG footprint).

Business sustainability: To create and maintain a sustainable business we have adapted a careful policy in which we focus our business development and expansion strategy on our core business – defined in our ACO Group ONE25 business plan.

Our business focus remains around 3 main areas: Surface Water Management, Building Drainage and Building Material and we aim to reach a global turnover of 1.25 billion Euros by 2025.

Since we defined this new multiyear objective in the last part of 2021, war in Ukraine has started and the already existing inflationary tensions have not only not been released but enhanced. We hold our ambition of continuously



Malmö (Sweden) drainage solution design

growing our organic level of activity until 2025 and beyond although we understand that the business environment is different and will require our agile adaptation.

As mentioned in the former point, the current global energy market situation is just inviting us to accelerate our investments on smarter energy consumption and reorient it towards cleaner energy sources. In 2021 we have installed our first electric chargers for our progressively renovated car fleet and for 2022 we have budgeted several investments on our Ringsted premises both on energy consumption reduction and change from fossil fuels to electricity, which should bring us a substantial step ahead on reducing our GHG footprint.

For 2023 we are analysing investments on available renewable sources of electricity, and we really look forward to its potential to not only offset completely our CHG contribution but potentially generate additional energy that we can share with other businesses that have not reached yet that point on their sustainability journeys.

At ACO Nordic Group A/S we cherish our reputation as a contributor to water sustainability, and we can proudly say that we have never faced any environmental non-compliance claim with the existing norms and regulations.



GOVERNANCE



2.1.- Governing bodies

The ACO Nordic Group A/S has a very flat managerial structure, where the executive committee is composed by the CEO and the CFO of the group.

The activity performed by the executive committee is supervised by the supervisory board, composed by:

- Hans Julius Ahlmann; Chairman and Shareholder.
- Hans Peter Meyer; Member of the ACO Severin Ahlmann GmbH and Co. KG advisory board.
- Jens Uwe Paasch; CFO of the ACO Severin Ahlmann GmbH and Co. KG.
- Lene Bryde; CEO of ACO Funki A/S

The supervisory board calls the executive committee between 2 and 4 times per year on business reviews to treat the most significant topics and they do not perceive any remuneration for this work.

It is the function of the supervisory board to provide strategic guidance and validate the goals settled for the short, middle, and long terms. Further guidance on the company values, mission and vision is also provided by the supervisory board, being the highest governance body the ACO Nordic Group A/S.

Respectively, it is the function of the executive board to communicate the supervisory board the current status of

the business, its performance, the outlook on its future evolution and of course, any concern they might understand as critical.

In the same way, the members of the executive committee in ACO Nordic Group A/S act as supervisory board for all the affiliate companies, where the local management present on their turn between 2 and 4 times a year their activities and outlooks on the business performance. As well, no remuneration is provided in this case.

On a daily basis the decisions are taken by the ACO Nordic Group A/S affiliates' local management following the delegation of authority documents shared with each of them on a formalized basis since 2016, limiting their actions in terms of investments, onboarding and laying off employees, customers and suppliers' negotiations, banking relations and other topics. It is the prerogative of the local management to extend the application of the delegation of authority procedure to their employees.

2.2.- Management approach and actions undertaken during 2021

It is the responsibility of the ACO Nordic Group A/S to provide a clear guidance to all its affiliates and employees on how to make business on a lawful and ethical way, as well

as create and operate a governance structure that supports the mentioned guidance.

Following the Transparency International Assessment by country on the corruption perception index 2021 (last available up to the date of publication of this report), we know that in the Nordic markets, we operate on, are a relatively safe environments, which historically has allowed us to keep the ethical topic on the level of top management exemplarity.



ACO training facilities in Rendsburg (Germany)

However, we are conscious that there is always a certain risk linked to individual behaviour and the best protection against its consequences is to have a strong company culture and processing structure that guides individuals on the

right path. To limit the individual behaviour risk, during 2018 and in line with the ONE21 objective to adopt global approaches in several areas, we implemented at the ACO Nordic Group A/S and its affiliates a Code of Ethics aligned with the ACO Group. The target being to formalize and document guidelines in subjects as diverse as general business behaviour, anti-corruption, conflict of interests' management, data protection, working health and safety, protection of the environment, etc.

In the case of anti-corruption, our Code of Ethics makes special emphasis on not providing or getting gifts or benefits for personal profit on detriment of our company or our business partner. It is also forbidden to offer or take any kind of bribes, either directly or through third parties. Each manager and employee of the Nordic subgroup and its affiliates has been requested to read and subscribe the code of ethics. To ensure full understanding, we have been granting translation to local languages where it was required.

During 2020, we succeeded to implement our supplier code of conduct also upon our main third-party suppliers. This code will ensure that the values we demand to ourselves in the ACO Nordic Group A/S are also respected upstream in the supply chain to let us guarantee our customers and any other stakeholder, that we conduct business on the most respectful and transparent way. The values of the

company remain represented in the following three sentences, which we know as our ACO DNA:

ACO. creating the future of drainage

ACO. committed to excellence with passion

ACO. a strong family you can build on

However also the ACO Group is making steps to embrace sustainability as a part of its mission and strategy and therefore has included an additional claim on its ACO DNA:

ACO. we care for water

We keep leaning on our internal controls system Impero to ensure that our business processes are at the same time flexible to adapt to our customers' needs, but also safe, limiting both: mistakes and potential fraud.

2.3.- Conflict of interests

The Code of Ethics, underwritten by each employee of the ACO Nordic Group A/S, and its affiliates, includes a specific appendix on the subject of conflict of interest. The company requests from every employee to communicate, without having to issue any additional request, to their local board of directors, any kind of conflict of interest they might be facing, either at their recruitment or supervening subsequently.

The local management board should take a decision respect the reported conflict of interest and communicate their decision to the ACO Nordic Group A/S executive committee.

2.4.- Transparency hotline and results during 2021

The grievance mechanism for any concern on the business ethics' topic is contemplated in our Code of Ethics itself. The ACO Nordic Group A/S top management will receive through the e-mail address ethics.nordic-line@aco.com the details about the mentioned concern, with the firm commitment to analyse each and every communication received in that address, granting the anonymity of the whistle blower and refraining from any retaliation when acted in good faith.

To date, no ethical concern was reported through the mentioned e-mail address or any other mean to the ACO Nordic Group A/S executive committee.

At the same time, no legal action has been undertaken against ACO Nordic Group A/S or any of its affiliates or employees concerning anti-competitive behaviour, anti-trust or monopolistic practices or non-compliance with laws and regulations in the social and economic area.



PEOPLE AND CULTURE





Employees gathering for the first time since Covid-19



ACO Nordic Norway



Social event for employees at Plastmo and ACO Nordic Denmark

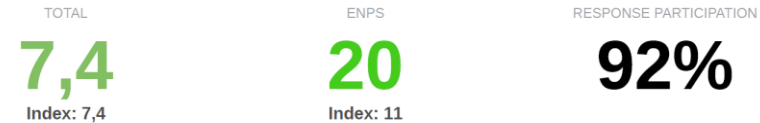
3.1.- Management approach and actions undertaken during 2021

The management at all levels in the organization has from the implementation of the Code of Ethics, a written reference of behaviour on what respects employees and other colleague’s treatment. The Nordic culture, where the management empowers the employees through **trust**, has been the inspiration of our Code of Ethics. We believe this model provides open channels for communication and mutual beneficial relations from the first day of professional co-operation.

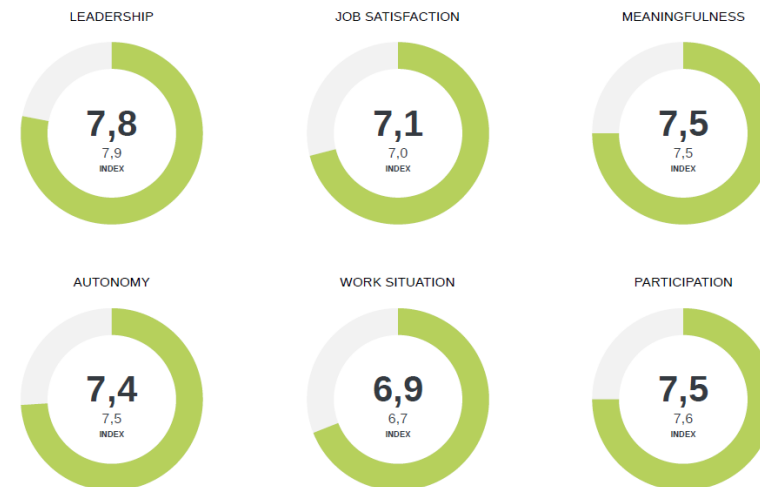
Furthermore, the Nordic subgroup is settled on a macroeconomic environment with low unemployment rates in most of the markets where we operate. Therefore, we understand that attracting and retaining the talent that we need to achieve our objectives is not only about contractual economic conditions, but also about a good fit into our culture and a management style that fosters creativity, controlled risk assumption and high levels of satisfaction linked to both, personal, team and at a larger extent, Nordic performance.

2021 has been the first full year that we have counted with the support of the Winningtemp application, helping us to measure employee satisfaction. We are humbled by the high level of employee participation (92% of all the scoped employees were regularly providing weekly feedback) and

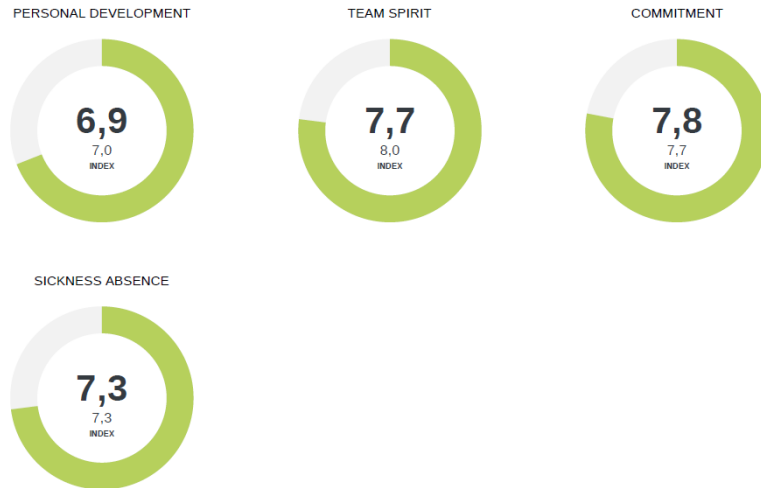
for the Net Promoter Score well ahead of market average, although the general temperature was just at par with the market



The specific indicators generated by Winningtemp were also positive, although fluctuating through the year 2021, usually replicating the intermittent conditions to access the corporate premises due to Covid-19 restrictions, which negatively impacted the mood of our colleagues.



Particularly worrying was during some months (and also the average of the year) the “team spirit” indicator, which was the most affected by Covid-19 restrictions and were our score was substantially behind the market average. Today the indicator is at 7.9, closing, significantly, the gap with the average in the market.



3.2.- Safety, health and wellbeing in the work-place and beyond

The ACO Nordic Group A/S and its affiliates comply with all applicable legislations and regulations in this matter. There are three production sites on the scope: a) 2 belonging to Hvidbjerg Vinduet A/S, both in Hvidbjerg itself and Nors (Denmark) and b) 1 belonging to Plastmo A/S, based in Ringsted (Denmark). Each of those sites have their own safety program. More details about their specific programs, risk management and others, are made available in each affiliate.



The yearly statistics on absenteeism, show a situation that is not worrying, however our approach to mitigation of risks and hazards for the wellbeing of our employees and any other business partner working with our products is to anticipate and prevent, going beyond the applicable standards. As part of our approach, we also analyse the events that have happened in the past and adapt our internal policies to avoid that anything similar happens again.

Also, to be highlighted as a sign of good governance in this area is that the Danish affiliates, both ACO, Plastmo and Hvidbjerg, have been awarded with the “green smile” certification during the last inspections carried out by “Arbejds Tilsynet”.

Absenteeism

<i>figures in working days</i>	2020	2021	21/20 %
ACO Denmark	120	139	15,8%
ACO Sweden	245	185	-24,3%
ACO Finland	-	3	0,0%
ACO Norway	-	19	0,0%
Division ACO	365	346	-5,1%
Plastmo Denmark	798	460	-42,3%
Plastmo Norway	2	23	1050,0%
Plastmo Poland	-	-	0,0%
Plastmo Railing	124	244	96,8%
Division Plastmo	924	727	-21,3%
ACO Lithuania	-	-	0,0%
ACO Latvia	-	104	0,0%
ACO Estonia	7	7	0,0%
Division Baltic	7	111	1485,7%
Nordic Group	-	4	0,0%
Eternitveien	-	-	0,0%
ACO Servicepartner	-	-	0,0%
TOTAL NORDIC SUBGROUP	1.296	1.188	-8,3%
Hvidbjerg	1.070	1.642	53,5%
TOTAL "ACO NORDIC GROUP A/S"	2.366	2.830	19,6%

3.3.- Employee satisfaction and talent retention

As mentioned, all ACO entities in the ACO Nordic Group have started to use Winningtemp software as a weekly frequency employee satisfaction survey.

Furthermore, we understand that a transparent communication with the employees is a big component of their satisfaction, moreover, when it comes to communication with their hierarchical responsible. That is why, in the ACO Nordic Group A/S, we try to share information on a regular basis, so all the employees are aware of the latest news on the organization, performance compared to budgets and forecasts, etc. Some examples are the monthly meetings that Plastmo has in the canteen with all their employees, the Nordic finance and IT meetings where all the employees of those departments get to know all the last developments on what regards IT projects, finance performance, organizational changes, social events etc.

There is no standard policy on what regards how much anticipation we should give to the employees on big restructuring operations.

Finally, on what regards rights of association, all the entities on the scope of this report, respects, of course, the legislation about employees' right of association and collective bargaining. Also, during the implementation of the suppliers' code of conduct we are requiring to our upstream

supply chain partners to be respectful as well in this area and grant to their employees this right according to their corresponding local regulations.

3.4.- Diversity and inclusion

ACO Nordic Group A/S, as mentioned already, is aware of the high level of competition for highly qualified talent needed to achieve our common targets. Therefore, it has a fringe benefits policy (health insurance, regular health checks, pension plan, disability insurance, variable incentives, etc) that is not just according to the applicable legislation, but on the competitive side of the market habits.

We offer the same opportunities, treatment, remuneration and benefits to all our employees and we give equal chances to candidates that wish to join forces with us, prioritizing intellectual skills and emotional capabilities over gender, age, race, nationality, or any other characteristic that could limit us from always getting the best candidate to fit in our requirements.

We understand diversity the way to ensure richness of points of view when it comes to decision making.

The highest governing body

Our supervisory board has got renewed during 2021, removing Thomas Heldgaard as he left the company, but

retaining all other members, including Lene Bryde, CEO of the sister company ACO Funki A/S, as a step in the direction to ensure female gender representation on our board.

Therefore the board is currently composed by 1 female out of 5 board positions and the target is to achieve in the next four years until the closing of 2025 a female representation of 1/3.

The other management levels

To ensure that we make the right steps towards a fair female gender representation on the other management levels to achieve as well at least 1/3 of female representation, we make sure that in our recruitment processes:

- The job advertisements for opened positions are gender neutral.
- Our headhunting partners try to bring relevant female candidates to the last phases of the recruitments.
- We offer compensation packages that are competitive for the corresponding labor market conditions, regardless gender.

We monitor with special care the top management composition (Managing Director and Finance Manager) on all the ACO Nordic Group A/S affiliates. In 2021 10 out of the 12 affiliates had a satisfactory balance (between 1/3 and 1/2 of

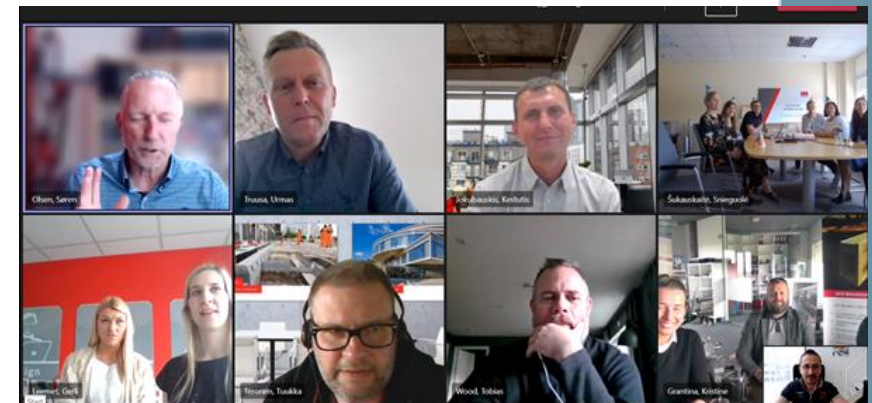
female presence and we will keep working to reach this proportion in all of them.

The ACO Nordic Group A/S have never faced any complain in any of our affiliates on what concerns respect to diversity and equal level of opportunities and we ensure through our Code of Ethics that all employees understand how important this subject is for us.

Furthermore, it is also our understanding that good financial performance is a basic requirement to catch the attention of candidates who are looking not only for an interesting place to deploy their skills and knowhow, but also to belong to a winning team that has integrated on its strategy the environmental sustainability to look for competitive advantages.

Therefore, we foster cooperation inside the ACO Nordic subgroup, but also healthy levels of competition, ensuring that we celebrate the successes we get and the milestones that support our culture of ACO. a strong family you can build on.

For statistics in the subject, please refer to the Table 4 at the end of this document.





3.5.- Training and education

Investing in our employees to perform better is a must if we want to supply them with the necessary tools to achieve their targets inside the organization. The focus is currently on developing a common CRM system and train the sales organization on using it at its best. Other investments into employees' skills have been traditionally analysed and approved by the hierarchy in the absence of human resources interlocutors.

Currently only the employees having assigned a variable remuneration, follow a regular interview with their hierarchical responsible about performance achieved, targets for the next financial exercises and career development opportunities. That comprises not only sales representatives and top management, but also a part of the back-office employees.

Most of the affiliates organize training events as well with construction specifiers (mainly architects and engineers) where we transfer knowhow on a professional way, about our products and solutions, giving the chance to our own employees to refresh their own skills, either as lecturer (usually the most senior) or attending to them as a listener (the newcomers). In any of the cases, we ensure respect of the norms of the corresponding professional bodies.



3.6 Human rights respect at ACO and our supply chain

3.6.1.- Management approach and actions undertaken during 2021

Working in a Nordic environment, human rights respect might seem out of question. Reviewing the supply chain, we have, which mainly brings up goods from EU countries and from intercompany transactions, we might think as well that risks in this area are very limited.

Those risks could be the potential use of forced or child workforce, and despite the low level of risk perceived, since 2018 we have taken specific steps in order to document our commitment with a total respect of human rights, both, in the Nordic subgroup, and in our supply chain.

First through our own code of ethics, to ensure compliance not just with the basic Universal Declaration of Human Rights proclaimed by the UN in its assembly in Paris on the 10th of December 1948 but going beyond on ensuring respect and equal level of chances for every colleague (more details in the article 2 of our Code of Ethics).

Then through our suppliers' code of conduct to ensure that our final products offered to the market are absolutely respecting the mentioned human rights' principles.

The suppliers' code of conduct was agreed internally during 2018 and has been accepted by all our intercompany suppliers in 2019 and our main third-party ones during 2020, being our objective to maintain the focus in the topic in the future and challenge, in that sense, any new partner.

3.6.2.- Child and forced or compulsory labour risk

We have been analysing the structure by country of our supply chain and we believe that there is little or no chance of either child or forced labour in any of our supply partners.

Here below enclosed the structure of our purchases by country and split between group or 3rd party purchases, but in percentage and value:

figures in m€

	Group	3rd Part
Germany	14,6	4,2
Denmark	3,9	11,3
Czech Republic	5,6	-
Poland	1,1	4,6
UK	0,1	3,4
Israel	-	0,5
Others	3,2	6,5
TOTAL	28,5	30,5

figures in %

	Group	3rd Part
Germany	51,3%	13,6%
Denmark	13,6%	37,2%
Czech Republic	19,8%	0,0%
Poland	4,0%	15,0%
UK	0,2%	11,0%
Israel	0,0%	1,7%
Others	11,1%	21,4%
TOTAL	100,0%	100,0%

As all the intercompany suppliers and most of the 3rd party ones have committed to our supplier code of conduct, we understand that every upstream player on our supply chains is aware of this risk and tries to make sure, for their own benefit, that nobody is involved on child or forced labour.



ENVIRONMENTAL SUSTAINABILITY



4.1.- Management approach and actions undertaken during 2021

Our business model is directly focused on one of the 17 Sustainable Development Goals (SDG hereinafter) identified by the United Nations in 2015 to ensure a more sustainable world by 2030.



Named the SDG #6, “Clean water and sanitation”, it has different meanings in the developed and the developing countries (for more details on this goal, please read <https://www.globalgoals.org/6-clean-water-and-sanitation/>).

The general risks associated to this topic, also applicable to us, are:

- The excessive consumption of limited resources, including, but not limited to energy and clean water (analyzed later in the section 4.4).
- The contribution to green-house effect emissions.
- The wrongful management of wastes, and lack of planning on the product lifecycle which could damage the natural ecosystem (see section 1.3. on our contribution to Wuppi shareholding to manage PVC recycling).

During 2021 we have made, through several workshops at management level, a selection of UN SDG targets where we believe we can have a positive meaningful contribution through focused action plans:

- SDG #3 “Good health and wellbeing” through our core business actions to protect water from pollution, but also through our sponsoring of Planbørne Fonden on a project to bring freshwater and sanitation to Burkina Faso.
 - Objective: Ensure supply chain commitment to our code of conduct and support fresh water and sanitation in developing countries.

- SDG #6 “Clean water and sanitation” as detailed before.
 - Objective: Accelerate the growth of our product portfolio dedicated to “clean”, “hold” and “reuse”.
- SDG #8: “Decent work and economic growth” with our suppliers’ code of conduct we ensure not only good labour conditions at ACO but also at our supply chain partners. Also, our continuous development of our portfolio through R&D efforts contribute to technological upgrading and innovation.
 - Objective: Ensure supply chain commitment to our code of conduct.
- SDG #9: “Industry innovation and infrastructure” through our participation and support to water infrastructure projects. The ACO Group is also present in Africa, India and South America, ensuring infrastructure support also on developing countries.
 - Objective: Accelerate our contribution to stormwater management projects, both at ground and roof levels.
- SDG #11: “Sustainable cities and communities” minimizing the risk of floods, water pollution and in general mitigating the effects of extreme climate events related to water as droughts and floods.
 - Objective: Become the reference partner to increase awareness on flood prevention in urban areas.
- SDG #12: “Responsible consumption and production” with our commitment to elaborate Environmental Product Documentation during the next years for all our portfolio as a base to progressively improve their life cycle contributions to the environment.
 - Objective: Prepare Environmental Product Documentation (EPD hereinafter) for the complete portfolio by 2025.
- SDG #13: “Climate change action” where we believe we can make a difference not only by offering a certified life cycle assessed set of products through the EPDs, but also carrying our operations with a progressively lower footprint, especially on what regards Green House Gasses (GHG hereinafter).
 - Objective: Detach our operations from fossil fuel consumption by 2030, which we believe is an achievable target, moreover if petrol and gas prices keep making more attractive its alternative renewable competitors.

4.2.- Our contribution to water management

4.2.1.- Collecting water with Seal-In technology

However, the ACO portfolio, as detailed in the section 1.3 of this document, counts with an extensive set of products to ensure the collection of water in different environments, both outdoors and indoors.

It can clean the water from oil, grease, heavy metals, and other pollutants and therefore contribute to the effort to manage efficiently a scarce resource as it is clean water.



Click to play our SealIn video (DE)

The “Seal in” technology in our channels, is exclusive in the drainage market, and ensures the collection of rainwater without any leakage, which is so important for the protection of our environment from the pollutants carried by it.

4.2.2.- Cleaning stormwater

Our wide range of separators, ensure that once the rainwater is properly collected from a diverse and challenging scope of situations (pedestrian areas, highways, parking lots, petrol stations, etc) is then treated in the adequate way before being released in the sewage system:

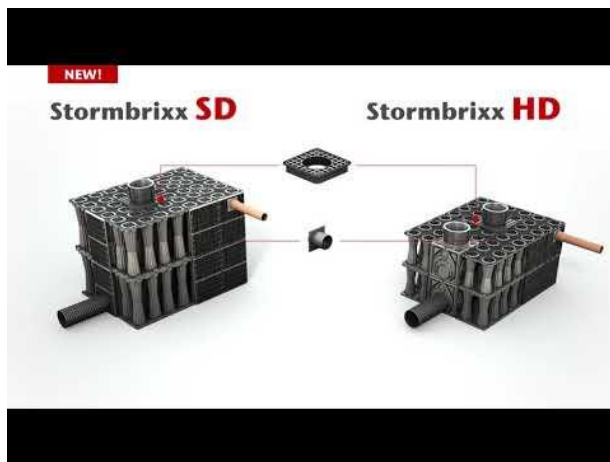


Rainwater Cleaning video (EN)

4.2.3.- Holding stormwater

Rainwater management is not only about how to get it clean into the sewage system. Unfortunately, global warming and climate change is increasing the frequency of heavily flooding rain events, especially in intensively urbanized areas where the water, does not have a natural way to be absorbed by the water table.

In the video here below enclosed the entire chain of water management, included "Stormbrixx" is explained. We can also see the explained release side of the chain, where we count with products helping the flow control or the lifting of water depending on the requirements of each application:



[Click to play Stormbrixx video \(EN\)](#)

ACO has included in its portfolio "Stormbrixx", a product that helps on the infiltration, attenuation, and retention of the rainwater with 2 versions SD (designed for car traffic) and HD (able to afford heavy traffic).

4.3.- Protecting natural habitats from human interaction

In our extensive portfolio we count with products as diverse as ACO Wildlife, a system composed by a barrier to avoid amphibians and small animals getting into the highways and a tunnel allowing them to cross safely from one side to another.



1,3km project in Nacka, Sweden

4.4.- Emissions, wastes and climate change

As announced in the former year report, our car policies prioritize Electric and Hybrid engines having excluded for new acquisitions, combustion powered cars. However, the scarcity on chip supply as a result of the Covid-19 first waves and the sudden recovery of global demand and then the problems with electric components manufactured in Ukraine for the main European vehicle brands have substantially delayed our transition to more sustainable transportation.



Charging station at Ringsted premises

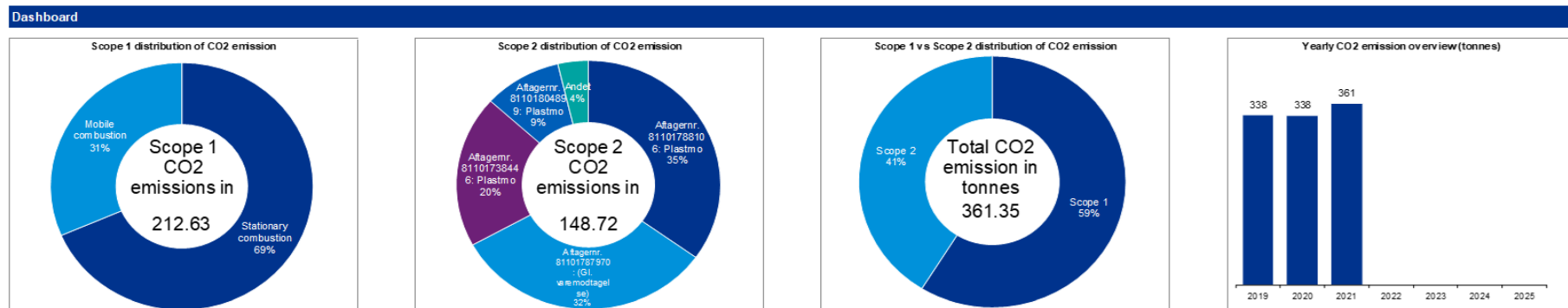
The production facilities in ACO Nordic Group A/S are very limited. As mentioned already in the introductory section 1. PVC productions are set up for the Plastmo Group in Denmark and Poland and, as also mentioned, in Denmark, we cooperate through a 20% ownership with Wuppi, a company which recycles the material at the end of the life of our products.

Also in Denmark, the ACO Nordic Group A/S count with production facilities elaborating windows mainly in PVC, aluminium and a combination of wood and aluminium.

Our suppliers' base is very stable, and we have not had any change during the year 2021. No environmental issue has come to our attention from any of them. However, once agreed with them the suppliers' code of conduct, we will evaluate the possibility of stablishing a due diligence program to scrutinize not only the candidates to become new suppliers, but also the existing ones.

As part of our compromise with the SDG-13 we have requested external consulting support to elaborate a tool that could help us to first understand what our GHG footprint is and then be the base for an action plan to progressively reduce it. The analysis shown below, corresponds only to our operations on the Ringsted premises and show a slight increase in 2021 due to the increased manufacturing activity as well as the return to the offices after Covid-19 restrictions.

As investments to curve down the GHG emissions are on its way but being conscient that it will take some time to be implemented and action is necessary at a faster path, we decided to buy offsetting certificates to compensate our activities in Ringsted for the years 2021 and 2022.



Key figures

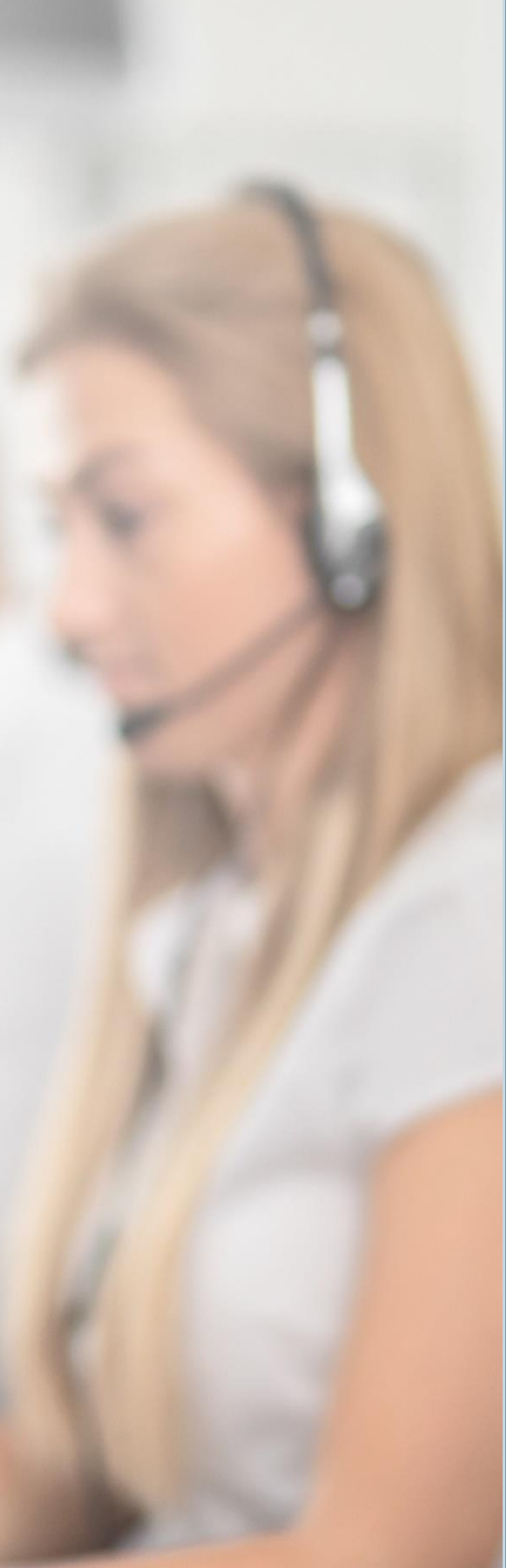
Scope	Ton CO ₂ -e	Distribution of ton CO ₂ -e (%)
Scope 1	212.6	58.8%
Scope 2	148.7	41.2%
Scope 3	N/A	N/A
Total	361.3	100.0%
Outside of scope		

Key figures	Ton CO ₂ -e
CO ₂ -e per employee	1.04
CO ₂ -e EURm / revenue	3.97
CO ₂ -e per m ² of facility	0.07
CO ₂ -e / EBITDA	45.17
Location-based method (Scope 2)	148.72
Market-based method (Scope 2)	0.00

Key figures	Ton CO ₂ -e
1 Varme	145.65
2 Aftagernr. 8110178810: Plastmo	51.92
3 Aftagernr. 81101787970: (GL varemottagelse)	47.69
4 Aftagernr. 8110173844: Plastmo	29.42
5 ACO Gasoline (5 cars)	20.27
Total	294.95

Key figures	%
Electricity covered by CER's	102.11
Natural gas covered by CER's	154.48

GHG monitoring tool screenshot



CUSTOMER SATISFACTION AND ADAPTATION



5.1.- Management approach and actions undertaken during 2021

The ACO Nordic subgroup has a continuous and open dialog with its direct customers, in most of the cases the wholesalers of the sector, but also with all the actors involved in the construction sector, where contractors, sub-contractors, architects, engineers, installers, designers, owners and other partners participate in the process.

We believe that being present and advising all of them, grant us a position of respectable partner with deep knowhow on water management, both for civil engineering projects, but also, on the building construction. In line with our DNA statement, it is our target to build an image of reliable long-term partner, committed to deliver excellence with passion.

We use every opportunity to approach our partners to request feedback and to get closer to their needs, which at the end help us developing a business model that continuously adapts to the market requirements. In that sense, during the COVID-19 pandemic, we have embraced online events as the best way to stay close to our customers, protecting their and our health.



<https://www.beyond.aco/> online seminar for architects

5.2.- Customer health and safety

Our products are designed not only to fit with the needs of the construction sector in terms of water management and other applications for our extensive portfolio. We design our products, also for the best functionality, cost effectiveness and visually appealing finishing, and we take care of the people involved in its handling during the transport, installation, maintenance, and daily usage, without risk for their health and safety.

Also, people not related directly with our business, are exposed, daily, maybe without noticing it, to our products.

We are present with our large range of external line drainage products in airports, harbours, commercial streets, stadiums, and others. The ACO employees grant that for each application we get the right product installed in the correct way, so when supporting different level of pressures and forces the product resist the pass of time without being deteriorated and the safety of those exposed to them are put at stake.

During the year 2021 the Nordic subgroup has not faced any claim in this regard, and we keep working on ensuring not only the quality of our products, but also its right application for a long-lasting performance.

There are areas of our industry, where we are proud to contribute with innovative solutions to challenges that were putting at risk human lives. The next two chapters are dedicated to two of those challenges we have solved

5.2.1.- Hygiene First

The food processing industry and the commercial kitchens have been facing several cases of listeria infections, which is one of the most virulent foodborne pathogenic bacteria, getting on 20 to 30% of the cases fatal for the humans infected. Following the data gathered by the European Center for Disease Prevention and Control latest available report, the average rate of human listeriosis was 0.5 cases for

100.000 inhabitants, being more than tripled (1.6 cases) among children under 1 year old and elderly above 65 years old.



Click to play the Hygiene First video

As our Nordic Managing Director, Soren Olsen, was mentioning in the video above, this issue is affecting not just underdeveloped countries, but is something we have unfortunately seen also in the Nordic environment.

ACO drainage and grease separation systems are designed around the three most important topics for the food service industry: food safety, cost management and health & safety. We design our products to drain processed wastewater hygienically and economically, exceeding the high standards established by the European Hygienic Engineering and Design Group (EHEDG).



[Click to play the Hygiene First video](#)

5.2.2.- Tunnels

Another situation where ACO products have succeeded to excel and make a competitive advantage out of a circumstantial challenge is our solutions for tunnels. There, the danger of having vehicles carrying inflammable substances and having an accident can be minimized using our solution as explained in the video here below, designed specifically for the Norwegian market, where many tunnels are currently under construction to cope with the difficult geography of the country, especially on the west coast.



[Click to play the tunnel video \(NO\)](#)

5.3.- Customer privacy

As part of our policy to focus on customer care, we put their privacy first. Enjoying the enforcement of the European Regulation 2016/679 on personal data protection at the end of May 2018, we have strengthened our internal processes around the subject to ensure that not only we have not gotten any claim or complain so far, but that no question rises in the future about our commitment in this topic.

5.4.- Innovation in processes and efficiency to ensure competitiveness

5.4.1.- Management approach and actions undertaken during 2021

It is ACO Nordic subgroup's management understanding that improving our own internal processes help us to free resources to focus on what is our core competences around water management and support our business partners in the construction sector.

From 2016 until 2019 we were working on strengthening and harmonizing our ERPs. Once we succeeded to enrol Poland, the last remaining affiliate, we have started working on a harmonization of our CRM and BI tools. Those projects

were frozen due to precautionary financial measures taken during the first COVID-19 wave, but investments have been restarted again and we are about rolling out the CRM project in the first affiliates, targeting to conclude this endeavour by 2022. Also, the harmonization of our financial and operational intelligence under a common BI is a project that is advancing in parallel, and we have the aim to conclude all its phases in the same time scope.

Other efforts to promote balanced processes between efficiency and safety are also mentioned in the section 2.5 about Risk Management.



SUPPORT TO SPORTIVE AND ARTISTIC TALENT



6- Supporting culture and sport

6.1.- Management approach and actions undertaken during 2021

It is at the heart of the ACO Group to contribute and support culture and sport. The ACO Group organizes NordArt (the largest Art exhibition in northern Europe), which unfortunately did not occur during 2020 and 2021, due to the pandemic restrictions. However, for 2022 under the name “Beyond Borders” it is expected to host the art pieces from Polish artists that after the second world war have expressed their creativity in other parts of the world (USA, France, Lebanon, Great Britain, Ukraine, etc).

Also, most of the other events the ACO Group used to participate as sponsor, were cancelled in 2021 (the Schleswig-Holstein Music Festival, the Imland-Lauf race in Rendsburg, and the Musto Skiff sailing competitions). More information about this subject is available in our website:

<https://www.aco.com/en/about-the-aco-group/commitment/>

The Nordic subgroup participates and gives the chance to the interested employees to join some of those events, as the mentioned Imland-Lauf and the NordArt exhibition.



Sculpture park at ACO in Rendsburg



Sculpture park at ACO in Rendsburg

We also sponsor several local sport talents in our closest vicinity in Ringsted, like Rune Thorst, currently competing in Speedway U19 in Zealand or Tobias Mølbak Hansen a great Ringsted swimmer training at the Taastrup swimming facility and who missed recently to participate on the Danish Championship by 1/10 of a second.



Those are just some examples of our commitment with our community and with facilitating its access to sports and culture to develop their full potential, regardless of their economic status. Therefore, a significant part of our culture, expressed by "ACO. a strong family you can build on" benefits not only our dedicated employees that support each other, but also the larger society.



Appendices

Appendix 1.- Data annexes and tables

In this section, as well as in some other parts of this document, the reader will find some data we have collected about the ACO Nordic Group A/S activity, putting it in perspective, when possible, with comparable data in the market. However, as this is our first CSR reporting, some data might be missing for different reasons. Would you be particularly interested in some additional disclosure, please contact us at csr-nordic@aco.local.

Table 1.- Legal ownership chart

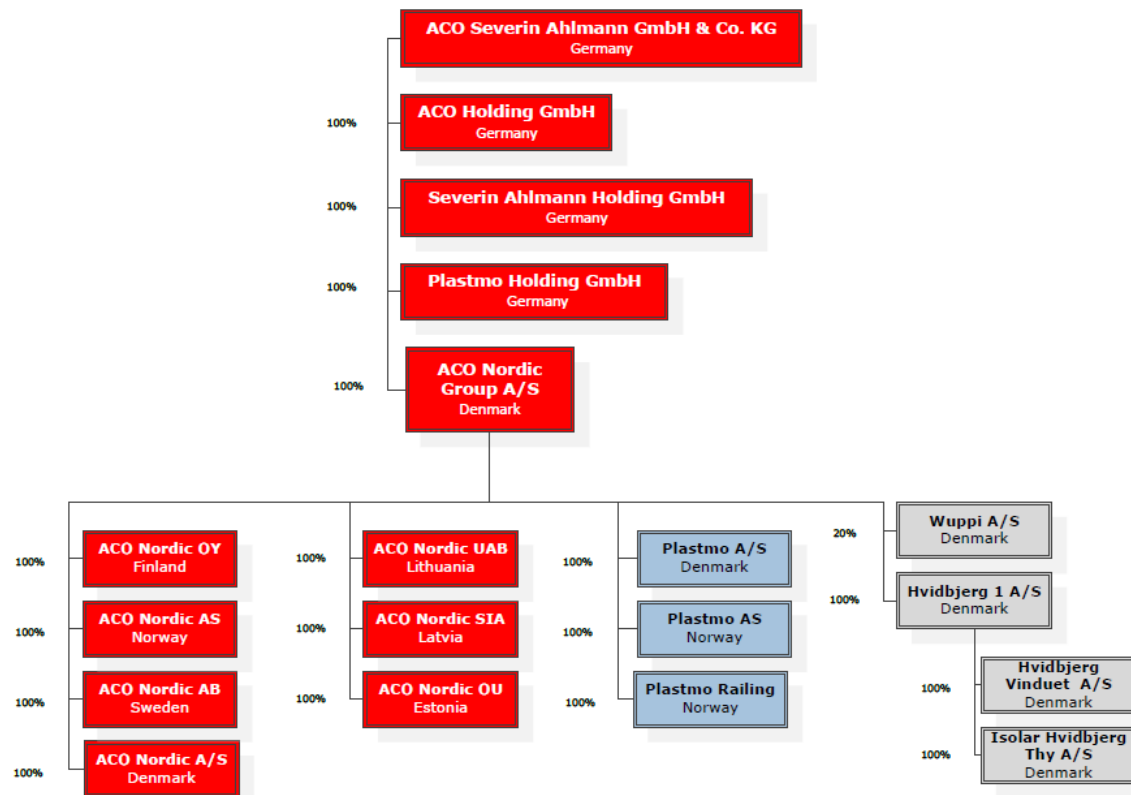


Table 2.- Data on organizational scale and location

<i>figures in t€</i>	Third Party Gross Sales	Employees	Equity	Assets	Equity / Assets	Operations	Location
ACO Denmark	7.457	16	1.062	3.510	30,3%	ACO Nordic A/S (sales office)	Thorsvej 9; Ringsted 4100 (Denmark)
ACO Sweden	14.471	27	2.088	5.606	37,3%	ACO Nordic AB (sales office)	Industrivägen 4; Sävedalen 43361
ACO Finland	4.554	9	733	1.658	44,2%	ACO Nordic OY (sales office)	Metsänneidonkuja 12; Espoo 02130
ACO Norway	3.528	8	522	1.971	26,5%	ACO Nordic AS (sales office)	Billingstadsletta 30NO-1396 Billingstad
Division ACO	30.010	60	4.405	12.744	34,6%		
Plastmo Denmark	27.839	59	5.599	10.682	52,4%	Plastmo A/S (Production, logistics and sales site)	Odinsvej 9-11; Ringsted 4100
Plastmo Norway	8.673	9	294	1.902	15,4%	Plastmo AS (Sales office)	Eternitveien 30; Slemmestad 3470
Plastmo Railing	1.422	10	411	1.799	22,9%	Plastmo Railing AS (Production, logistics and sales site)	Arnatveitvegen 137; Arnatveit 5262
Divison Plastmo	37.935	78	6.304	14.382	43,8%		
ACO Lithuania	5.750	10	859	1.597	53,8%	ACO Nordic UAB (sales office)	Lukiškių g. 5; Vilnius 01108
ACO Latvia	2.344	9	1.223	1.752	69,8%	ACO Nordic SIA (sales office and logistic center)	Dzelzavas iela 120, Vidzemes priekšpilsēta; Rīga, LV-1021
ACO Estonia	2.095	4	913	1.293	70,6%	ACO Nordic OU (sales office)	Akadeemia tee 39; Tallinn 12618
Division Baltic	10.188	23	2.995	4.642	64,5%		
TOTAL NORDIC SUBGROUP	78.134	171	36.760	61.228	60,0%		
Hvidbjerg	32.385	171	11.158	15.758	70,8%	Hvidbjerg 1 A/S (Production, logistics and sales site)	Industrivej 18; 7600 Struer
TOTAL "ACO NORDIC GROUP A/S"	110.518	342	47.917	76.986	62,2%		

Table 3.- Material topics and GRI standards' mapping

Material topics	Danish requirements alignment	GRI standards alignment
A Safety, health and wellbeing in the work place and beyond	Social and employee matters	403
B Employee satisfaction and talent retention	Social and employee matters	401, 402, 407
C Diversity and inclusion	Social and employee matters	405, 406
D Human rights respect at ACO and in the supply chain	Human Rights	408, 409
E Training and education	Social and employee matters	404
F Transparency and good governance	Anti-corruption and bribery	205, 206, 418, 419
G Our contribution to water management	Environmental protection, including climate	303
H Emissions, wastes and climate change	Environmental protection, including climate	306, 308
I Business sustainability	Other impacts.	307
J Risk management	Other impacts.	
K Customer satisfaction and adaptation to their needs	Other impacts.	416, 418
L Innovation in processes and efficiency	Other impacts.	
M Backing culture and sport	Other impacts.	

Tables 4.- Employees' statistics

	Fixed full time contract						Temporary, part time, trainee and other						TOTAL
	Male			Female			Male			Female			
	A	B	C	A	B	C	A	B	C	A	B	C	
ACO Denmark	-	8	4	-	2	1	-	-	1	-	-	-	16
ACO Sweden	-	11	10	-	3	2	-	-	-	-	-	-	26
ACO Finland	1	2	3	-	1	2	-	-	-	-	-	-	9
ACO Norway	-	1	4	-	1	2	-	-	-	-	-	-	8
Division ACO	1	22	21	#	7	7	-	-	1	-	-	-	59
Plastmo Denmark	6	17	15	3	4	5	1	-	2	1	3	2	59
Plastmo Norway	-	4	2	-	2	1	-	-	-	-	-	2	11
Plastmo Railing	-	4	2	-	2	-	1	-	-	1	-	-	10
Divison Plastmo	6	25	19	3	8	6	2	-	2	2	3	4	80
ACO Lithuania	-	4	1	1	4	-	-	-	-	-	-	-	10
ACO Latvia	1	4	1	1	1	-	-	1	-	-	-	-	9
ACO Estonia	-	2	-	2	-	-	-	-	-	-	-	-	4
Division Baltic	1	10	2	4	5	-	-	1	-	-	-	-	23
Nordic Group	-	4	4	-	2	-	-	-	-	-	-	-	10
TOTAL NORDIC SUBGROUP	8	61	46	7	22	13	2	1	3	2	3	4	172
Hvidbjerg	15	49	63	2	8	20	4	-	5	-	3	4	173
TOTAL "ACO NORDIC GROUP A/S"	23	110	109	9	30	33	6	1	8	2	6	8	345

																		Changes during 2020																	
Hires						Resigned						Dismissed						Maternity						Retired / other											
Male			Female			Male			Female			Male			Female			Male			Female			Male			Female								
A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C			
ACO Denmark																																			
ACO Sweden																																			
ACO Finland																																			
ACO Norway																																			
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Plastmo Poland																																			
Plastmo Railing																																			
Divison Plastmo						2 11 4 1 1 0 0						8 0 0 0 0 4						11 5 2 6 1 0 0 0 0 1 0 0 0 0 0 0						0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0											
ACO Lithuania																																			
ACO Latvia																																			
ACO Estonia																																			
Division Baltic						0 1 0 1 0 0 1						0 0 0 0 0 0						0 0 0 1 0 0 0 0 0 1 0 0 0 0 0 0						0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0											
Nordic Group																																			
ACO Servicepartner																																			
TOTAL NORDIC SUBGROUP						3 15 4 2 3 0 1						10 0 0 2 0 4						12 5 2 8 1 0 0 0 0 2 0 0 0 0 0 0						0 0 0 0 2 0 0 0 0 0 0 0 0 0 0 0											
Hvidbjerg																																			
TOTAL "ACO NORDIC GROUP A/S"						19 23 18 6 7 6 9						17 6 5 6 0 4						12 5 2 8 1 0 0 0 0 2 0 0 0 2 0 0 2						0 0 0 0 2 0 0 0 2 0 0 2 0 0 2											

* age groups are 3: a) under 30; b) between 30 and 50; c) above 50

Career development				
	Avg. hours of training per employee	# of employees under bonus scheme	%	For the ones not having bonus, do they have regular performance and career development reviews?
ACO Denmark			0,0%	-
ACO Sweden	14	27	100,0%	-
ACO Finland		8	88,9%	
ACO Norway	75	7	87,5%	
Division ACO			0,0%	
			0,0%	
Plastmo Denmark	3	29	48,3%	all 1 once a year
Plastmo Norway	2	9	81,8%	
Plastmo Poland	N/A	N/A	N/A	N/A
Plastmo Railing			0,0%	
Divison Plastmo			0,0%	
ACO Lithuania	3	4	50,0%	
ACO Latvia	-	5	62,5%	-
ACO Estonia	8	4	100,0%	
Division Baltic			0,0%	
Nordic Group			0,0%	
ACO Servicepartner			0,0%	
TOTAL NORDIC SUBGROUP			0,0%	
Hvidbjerg	-	-	0,0%	-
TOTAL "ACO NORDIC GROUP A/S"			0,0%	

Table 5.- External initiatives and memberships

	Collective bargain	External initiatives	Membership associations
ACO Denmark	If union	Hospitals klovne - TI	Dansk Industri
ACO Sweden	If union	The West Sweden Cf	Yes
ACO Finland	If union		
ACO Norway	If union	No	No
Division ACO			
Plastmo Denmark	If union	Kværkeby IF, Ringste	Dansk Industri, Wuppi
Plastmo Norway	If union	No	No
Plastmo Poland	If union		
Plastmo Railing	If union	No	GF Norge , NHO
Divison Plastmo			
ACO Lithuania	If union		
ACO Latvia	If union	No	No
ACO Estonia	If union	No	No
Division Baltic			
Nordic Group	If union		
ACO Servicepartner	N/A	N/A	N/A
TOTAL NORDIC SUBGROUP			
Hvidbjerg	If union	N/A	Dansk Industri
TOTAL "ACO NORDIC GROUP A/S"			

Appendix 2.- GRI content index

1.- General disclosures

1.1.- Organizational profile

- Disclosure 102-1 Name of the organization [section 1.1].
- Disclosure 102-2 Activities, brands, products, and services [section 1.3].
- Disclosure 102-3 Location of headquarters [section 1.1].
- Disclosure 102-4 Location of operations [section 1.1].
- Disclosure 102-5 Ownership and legal form [section 1.1 and appendix 1, table 1].
- Disclosure 102-6 Markets served [section 1.1 and 1.3].
- Disclosure 102-7 Scale of the organization [appendix 1, table 2].
- Disclosure 102-8 Information on employees and other workers [appendix 1, tables 4].
- Disclosure 102-9 Supply chain [section 1.2].
- Disclosure 102-10 Significant changes to the organization and its supply chain [section 1.4].
- Disclosure 102-11 Precautionary Principle or approach [section 1.2].
- Disclosure 102-12 External initiatives [appendix 1, table 5].
- Disclosure 102-13 Membership of associations [appendix 1, table 5].

1.2.- Strategy

- Disclosure 102-14 Statement from senior decision-maker [section “Letter from the CEO”].

- Disclosure 102-15 Key impacts, risks, and opportunities [section 1 and section 1.5].

1.3.- Ethics and integrity

- Disclosure 102-16 Values, principles, standards, and norms of behavior [section 2.2].
- Disclosure 102-17 Mechanisms for advice and concerns about ethics [section 2.2].

1.4.- Governance

- Disclosure 102-18 Governance structure [section 2.1].
- Disclosure 102-19 Delegating authority [section 2.1].

- Disclosure 102-23 Chair of the highest governance body [section 2.1].
- Disclosure 102-24 Nominating and selecting the highest governance body [section 2.1].
- Disclosure 102-25 Conflicts of interest [section 2.3].
- Disclosure 102-26 Role of highest governance body in setting purpose, values, and strategy [section 2.1].
- Disclosure 102-33 Communicating critical concerns [section 2.1].

1.5. Stakeholder engagement

- Disclosure 102-40 List of stakeholder groups [Section "About this report"].
- Disclosure 102-41 Collective bargaining agreements [appendix 1, table 4].
- Disclosure 102-42 Identifying and selecting stakeholders [Section "About this report"]
- Disclosure 102-43 Approach to stakeholder engagement [Section "About this report"].
- Disclosure 102-44 Key topics and concerns raised [Section "About this report" and appendix 1, table 3].

1.6. Reporting practice

- Disclosure 102-45 Entities included in the consolidated financial statements [Section "About this report" and appendix 1, table 1].
- Disclosure 102-46 Defining report content and topic Boundaries [section "About this report"].
- Disclosure 102-47 List of material topics [section "About this report"].
- Disclosure 102-48 Restatements of information [section "About this report"].
- Disclosure 102-49 Changes in reporting [section "About this report"] .
- Disclosure 102-50 Reporting period [section "About this report"].
- Disclosure 102-51 Date of most recent report [section "About this report"] .
- Disclosure 102-52 Reporting cycle [section "About this report"] .
- Disclosure 102-53 Contact point for questions regarding the report [section "About this report"].
- Disclosure 102-54 Claims of reporting in accordance with the GRI Standards [section "About this report"].
- Disclosure 102-55 GRI content index [appendix 2].
- Disclosure 102-56 External assurance [section "About this report"].

2.- Topic specific disclosures

2.1. Management approach on transparency and good governance [section 2.2]

2.1.1. GRI 205: Anti-corruption

Disclosure 205-1 Operations assessed for risks related to corruption [section 2.2].

Disclosure 205-2 Communication and training about anti-corruption policies and procedures [section 2.2].

Disclosure 205-3 Confirmed incidents of corruption and actions taken [section 2.4].

2.1.2. GRI 206: Anti-competitive behaviour

Disclosure 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices [section 2.4].

2.1.3.- GRI 419: Socioeconomic compliance

Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area [section 2.4].

2.2. Management approach on Human Rights [section 3.6.1].

2.2.1.- GRI 408: Child Labor

Disclosure 408-1 Operations and suppliers at significant risk for incidents of child labor. [section 3.6.2].

2.2.2.- GRI 409: Forced or compulsory labor

Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor. [section 3.6.2].

2.3.- Management approach on Social and Employee matters [section 3.1].

2.3.1.- GRI 401: Employment

Disclosure 401-1 New employee hires and employee turnover [section 3.4].

Disclosure 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees [section 3.4].

Disclosure 401-3 Parental leave [section 3.4].

2.3.2.- GRI 402: Labor/Management relations

Disclosure 402-1 Minimum notice periods regarding operational changes [section 3.3].

2.3.3.- GRI 403: Occupational Health and Safety

Disclosure 403-1 Occupational health and safety management system [section 3.2].

Disclosure 403-2 Hazard identification, risk assessment, and incident investigation [section 3.2].

Disclosure 403-3 Occupational health services [section 3.2].

Disclosure 403-4 Worker participation, consultation, and communication on occupational health and safety [section 3.2].

Disclosure 403-5 Worker training on occupational health and safety [section 3.2].

Disclosure 403-6 Promotion of worker health [section 3.2].

Disclosure 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships [section 3.2].

Disclosure 403-8 Workers covered by an occupational health and safety management system [section 3.2].

Disclosure 403-9 Work-related injuries [section 3.2].

Disclosure 403-10 Work-related ill health [section 3.2].

2.3.4.- GRI 404: Training and education

Disclosure 404-1 Average hours of training per year per employee [section 3.5]

Disclosure 404-2 Programs for upgrading employee skills and transition assistance programs [section 3.5].

Disclosure 404-3 Percentage of employees receiving regular performance and career development reviews [section 3.5]

2.3.4.- GRI 405: Diversity and equal opportunity

Disclosure 405-1 Diversity of governance bodies and employees [section 3.4]

Disclosure 405-2 Ratio of basic salary and remuneration of women to men [section 3.4]

2.3.5.- GRI 406: Non Discrimination

Disclosure 406-1 Incidents of discrimination and corrective actions taken [section 3.4]

2.3.6.- GRI 407: Freedom of association and collective bargaining

Disclosure 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk [section 3.3].

2.4.- Management approach on customer satisfaction and adaptation to their needs

2.4.2.- GRI 416: Customer Health and Safety

Disclosure 416-1 Assessment of the health and safety impacts of product and service categories. [section 5.2]

Disclosure 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services. [section 5.2]

2.4.3.- GRI 418: Customer Privacy

Disclosure 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data [section 5.3]

2.5.- Management approach on environmental protection, including climate [section 4.1]

2.5.1.- GRI 303: Water and effluents

Disclosure 303-1 Interactions with water as a shared resource [sections 4.1 and 4.2]

Disclosure 303-2 Management of water discharge-related impacts [sections 4.1 and 4.2]

Disclosure 303-3 Water withdrawal [section 4.3]

Disclosure 303-4 Water discharge [section 4.3]

Disclosure 303-5 Water consumption [section 4.3]

2.5.1.- GRI 307: Environmental compliance

Disclosure 307-1 Non-compliance with environmental laws and regulations. [section 1.5]

2.5.2.- GRI 308: Supplier Environmental Assessment

Disclosure 308-1 New suppliers that were screened using environmental criteria [section 4.3]

Disclosure 308-2 Negative environmental impacts in the supply chain and actions taken [section 4.3]