# interseroh

Sustainability Update **2013** 



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### **Preface**

#### Dear readers,

Resource efficiency is one of the big topics of the day. The growing demand worldwide for raw materials calls for concepts that reconcile ecological, economic and social interests. A closed substance cycle waste management system that records and exploits the potential of materials along the entire value creation chain, from development to recycling, is therefore more than a vision.

Interseroh is already turning this vision into a reality: we close substance cycles – for products, materials and in logistics. We support our customers through closed-loop services, facility management, recycling and advice offers that help them improve their own sustainability performance and do business more economically. And we offer secondary raw materials that can replace the scarce primary resources in the long run. This is why we investigate new recoverable materials cycles and innovative recycling methods. With recythen® and procyclen®, we have developed high-tech granulates that are made almost entirely from post-consumer materials or production wastes – yet have the same auality as the initial raw materials.

We always demonstrate an economic and ecological added value to our customers through our services, know-how and ideas. Around 7.1 million tons of greenhouse gases were saved in 2012 alone through the recycling of recoverable materials in the entire ALBA Group, to which Interseroh belongs. At the same time, this meant that almost 41.1 million tons fewer primary raw materials had to be extracted from the earth, processed and moved – something we are proud of.

The sustainable organisation of our economic activity and our life is possible – we do our bit not just through closed substance cycles. Our business model is based on the principle of a sustainable development. We regard this as an obligation in all fields of our corporate actions – for a responsible management, the well-being of our employees and the commitment in society. This has been laid down in our sustainability strategy 'Really sustainable!'. It combines our innovative business model with the responsible organisation of our processes, thus reducing the ecological and social consequences of our actions.

The present status report presents the progress made in the implementation of our sustainability strategy. It therefore supplements our public avowal to responsible economic activities as evidenced through our signing of the German Sustainability Code in 2014. We hope you have an interesting read, and are looking forward to a continued dialogue on the various challenges facing sustainability with our customers, employees and in public.

Your Segment Management Board

Eric O. Mendel (Chairman) Hans-Stefan Kalinowski

S. Kalid

Markus Müller-Drexel

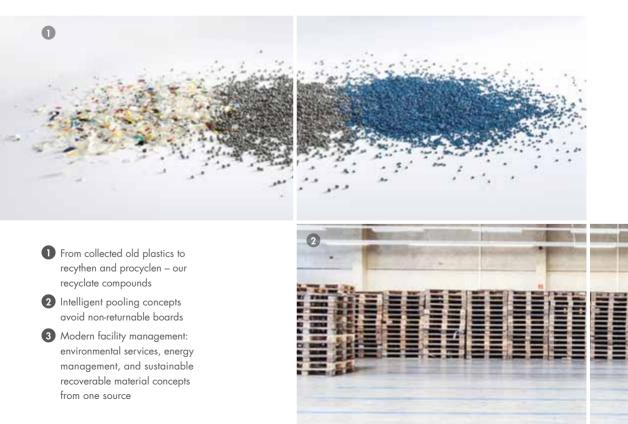
Dr. Uwe Rantzsch

### Resource efficiency as a business model

Interseroh is one of the leading providers of system services for the closure of product, material and logistics cycles. We advise our customers throughout Europe on the responsible handling of recoverable materials and offer them services that cover the entire value creation process.

In view of the enormous demand for raw materials in industrialised nations, we need concepts that can reconcile ecology and economy and that can accommodate the change in social values. One particularly sustainable approach is the idea of a completely closed substance cycle waste management.

Our business model is based on urgent social and ecological challenges as well as the economic growth potentials that can be developed through cyclically managed production, material and logistics processes. Herein, we are guided by the symbol of the closed-loop economy – an economic system with closed cycles that produces practically no wastes and requires no new resources. Even if this is still a vision, future growth will not be possible without observing these principles.



#### The global challenges are big

The global middle class will increase by around three billion consumers by 2030 and swell the demand for products and services. Raw materials will consequently become scarcer and more expensive. Gold, silver or tungsten could be exhausted within 5 to 50 years, if we continue along a linear subsistence strategy. Global prices for raw materials rose by 150 percent between 2002 and 2012 alone.

At the same time, around 6.4 million tons of waste end up in the oceans according to a study by the United Nations Environment Programme – most of it plastic. Estimates assume that 100 million tons of plastic are already swimming in the oceans as very small particles. The most persistent of these will take 450 years to be degraded.

#### Shaping tomorrow's economy

The services offered by Interseroh help us face up to these challenges and reduce environmental impacts. We work with experience and passion: We expand recycling systems and advise companies on the efficient organisation of their value creation processes. And we develop innovative secondary raw materials that do away with the manufacture of new plastics.

In this way, we are instrumental in shaping tomorrow's economy. Because in view of the progressive scarcity of resources, consistent recycling will become a success factor for companies and entire national economies. Estimates therefore predict the value creation potential for closed substance cycle waste management throughout Europe in the coming 20 to 30 years to be 500 billion euros.

Interseroh's business model relies on the consistent closure of substance cycles. We seize the opportunities along the four strategic business units: ReUse, ReDuce, ReCycle, ReThink.





### Our fields of business



#### **ReUse**

In this field of business, we develop concepts for sorting, recycling or reusing products for our customers and together with partners, and also organise and operate take-back systems. Solutions for the take-back of old electrical and electronic equipment are particularly important here.



#### **ReThink**

This area stands for our facility services at the company locations, shops and branch offices of our customers. We offer them a 'full service' from waste disposal through to maintenance – and always with the goal of improving their sustainability performances.



#### **ReCycle**

In this area, we close the material substance cycles with bespoke waste disposal and recycling solutions. We supply our customers with secondary raw materials, for example, tha allow new plastic products to be manufactured from recyclates – i.e. recycled plastics – instead of primary raw materials.



#### **ReDuce**

This field of business combines classic logistics processes with our waste avoidance, disposal and take-back competence. Our customers profit from sophisticated returnable systems, for example.



### **ReUse** — creating more benefits

Reusing serviceable products or parts and recovering valuable materials are success factors for closed substance cycle waste management. A precondition is customer-oriented take-back systems such as those developed by Interseroh. We thus create added value – for the environment, for dealers and for the manufacturers. And we give something back to everyone who helps us.



ReUse stands for the development of concepts for the sorting, recycling or reuse of products as well as the organisation and operation of takeback systems.

#### Raising awareness and sharing the profits

One example is the cooperation with schools in the 'Collecting dragon' initiative. Interseroh has been supporting more than 13,000 kindergartens and schools throughout Germany for over 14 years. The goal of this campaign is to support these with material goods, to make children aware of environmental protection and at the same time return valuable resources to the economic cycle. We place a 'Green Eco-Box' in the institutions to collect spent ink cartridges and mobile phones that are no longer needed. The institutions receive part of the profits made from this as bonus points which they can redeem in our online shop for school and play articles. Companies support the schools and kindergartens by collecting their used, recyclable products in the box.

#### **Encouraging returns**

The biggest and, unfortunately, largely unused potential to close product substance cycles exists with electronic scrap. It is still very hard to convince consumers to return their old devices to dealers or manufacturers. An estimated 120 million mobile phones that are no longer in use are therefore lying around in cupboards and drawers throughout Germany. In order to stem this potential, we develop novel solutions and methods that should simplify the return possibilities for consumers through dealers. Because old products can easily and efficiently be collected wherever new products are sold.

### **ReDuce** — enabling substance cycles

The closure of material and product cycles assumes intelligent logistics concepts: Interseroh wants to collect used raw materials at the right time and in the right place, as well as return these to the value creation process elsewhere in the right quality. Only then a loss-free recirculation of materials can be achieved.

#### Saving by returns

Interseroh thus combines its logistics competence with individual advisory concepts. We want to reduce our customers' material input and manage their flows of recoverable materials cost-effectively and ecologically. One example is the switch from non-returnable to returnable systems, which embody an ideal closed substance cycle waste management: they spare resources, save energy and avoid environmentally harmful waste. Our customers profit through a better ecobalance, optimised processes and at the same time cut costs.



ReDuce means avoidance. We combine classic logistics processes with our waste avoidance, disposal and take-back competence for our customers.

#### Intelligent logistics is a precondition

With our closed pooling cycle, we offer customised and optimised concepts for returnables logistics. For example, we organise a deposit-free pooling system for the transport of fruit and vegetables for the food trade – from the farmer to the grocer. The plastic folding boxes used for this replace the old cardboard boxes and can be reused time and again. This avoids expensive non-returnable boxes and spares resources: in this way, we save around 22,000 tons of board every year – as much as would be needed to print more than 15 million copies of the Concise Oxford English Dictionary. We also return the returnable containers themselves to the cycle after extensive use: our recycling plastic procyclen, from which we manufacture new crates, is made from unserviceable crates.

### **ReCycle** — closing the substance cycle

For Interseroh, thermal treatment for energy recovery is not necessarily the final step. On the contrary: we believe that materials that cannot be reused should consistently be recycled. We process valuable raw materials and are the first company in the industry to ensure that the secondary material that is recovered has the same quality as the primary material.

#### Revolution in recycling

We have revolutionised the recycling of plastics with the recycled-resource process over the past years. This concept completely closes the recoverable materials cycle – unlike former approaches that only produced lower quality products from recycled plastics. The granulate procyclen that is produced by this method is made from used plastic from household collections and is employed to produce household equipment or new packaging, for example. Interseroh is the first company in the industry to have succeeded with this upcycling, in other words, a reuse on the same quality level as the primary raw material.

#### The conditions have to be just right

Establishing such an intelligent recycling system requires innovative strength and entrepreneurial courage, but above all reliable framework conditions. Our services in the field of transport and sales packaging are organised extremely efficiently. But in direct competition with thermal treatment for energy recovery, the economic efficiency of collecting, sorting and recycling is repeatedly at risk – not least because it sometimes has to assert itself in markets that are strictly regulated. We believe that fair competition for the best and most efficient disposal solutions is a key requirement for increasing recycling shares.

This is why we have successfully campaigned for an opening of the Austrian market in future for a larger number of providers of waste disposal services for household packaging. Both customers and the environment will profit from this.

#### **Expert opinion on packaging recycling**

The German 'dual system' in which Interseroh has played an instrumental role since its foundation more than 20 years ago, is an achievement of closed substance cycle waste management that has set an international precedent. Politics, industry, trade, consumers, and waste disposal companies have to work together to continue this success story. This is one of the results of a study by former constitutional court judge Udo di Fabio, that was commissioned by the ALBA Group. The study shows that only the concerted efforts of the economy and politics can ensure that the secondary raw materials that are urgently required from an environmental and resource point of view will be available in an adequate quality, quantity and at an economically reasonable cost.



ReCycle comprises the closure of material cycles through customised waste disposal and recycling solutions. This also covers the supply of secondary raw materials.

### **ReThink** — thinking for customers

Rethinking customer-oriented services is part of Interseroh's daily job: together with our customers, we analyse the waste produced, material flows, and operating procedures in their properties, and identify optimisation potentials. We then concentrate the material flows locally, in the factories, warehouses or stores, and ensure efficient and legally sound waste disposal.

#### It couldn't be easier

To make location disposal as easy and economical as possible, we rely on innovative IT solutions. Since 2013, our customers have been able to order and manage all waste disposal services for their sites quickly and easily with the help of the mobile application 'APP&GO: the Interseroh collection app'. Our goal is to develop solutions for all auxiliary processes at our customer's locations – so that they can concentrate fully on their core business.



ReThink stands for all of our waste disposal and facility services at the company locations, shops and branch offices of our customers.

#### Well conceived all round

For us, this also includes taking on all kinds of facility management tasks: from a caretaker service, grounds maintenance, building cleaning or waste management, via technical services such as repair, maintenance and energy management, right through to commercial tasks such as bookkeeping and service charge accounting. This way, we promote a modern understanding of facility management, where environmental services, energy management and sustainable recoverable-material concepts go hand in hand. With our sustainable facility management, we have created an offer for the real estate industry that is increasingly faced with ecological questions.

### Interseroh sustainability strategy

#### **Creating value**

Establishing the Services Segment of the ALBA Group as the preferred system service provider for the sustainable development of its customers' value-creation processes and the closure of substance cycles

#### **Securing value**

Avoiding social and ecological burdens and developing sustainable innovation potentials

#### Really sustainable!

The motto of our sustainability strategy, 'Really sustainable!', is a permanent challenge for us, a long journey on which we will continue together with our employees and business partners. As a company in the recycling industry, we have know-how in the field of closed substance cycle waste management – in terms of leveraging sustainable development, this will prove even more decisive in the future.

During the development of this strategy, great store was placed on the general conditions for our business in future and on the derivation of opportunities from these. In internal workshops and talks with our stakeholders, we derived strategic implications from this analysis and summarised them in seven fields of action. Within the latter, we pursue goals that are aimed at both preserving and creating value along the entire value creation chain; these goals are set out in specific roadmaps and provided with detailed objectives.



### Our sustainability strategy

The aim of our strategy 'Really sustainable!' is the consistent implementation and further development of our business model. It stands for the claim to assume responsibility for the environment, employees and society in all of our corporate processes, and at the same time to support our customers and suppliers on their way to more sustainability.

In the various markets in which Interseroh is active, we pursue sustainability approaches that best cater for the specific customer requirements. In Poland, a platform initiated by the national subsidiary was launched in 2013 under the brand name Green Business. It enables small and medium-sized customers to prepare their own environmental reports - e.g. on their emissions, waste produced or packaging materials - and therefore not only satisfy the statutory requirements but also improve their own environmental performance. For environmental impacts can only be controlled where they are made transparent.

Since the strategy was adopted in 2012, it has been implemented on the basis of the roadmaps formulated in the seven fields of action. We have made great progress in some areas, but have also had to face a number of challenges.

#### Sustainability performance of our customers

One of the key points of the sustainability strategy is to improve the performance of our customers in terms of their own sustainability. This can mean many different things depending on the customer segment that is being addressed, since sustainability challenges differ from industry to industry.

Last year, we concentrated primarily on the real estate sector and on customers on whose sites we are responsible for the facility management. In 2013, in conjunction with German Facility Management Association (GEFMA) and other companies, we developed a ratings system for sustainability in facility management. It focuses its attention solely on service processes and the management of buildings and facilities, unlike existing certification options in the real estate sector. Following the initial pilot phase for testing the ratings system, the first certificates should be awarded in 2014 jointly by the GEFMA and the German Sustainable Building Council (DGNB). By participating in this initiative, developing and piloting the standards, Interseroh wants to support operators of commercial properties especially in managing their buildings in the future in a measurable, and thus economically sensible manner according to sustainability criteria.

All customers of Interseroh for whom we take care of waste disposal and recycling tasks, in 2013 once again profited from the positive effects of these services on the climate. In 2012, we were able to save a total of around 7.1 million tons of greenhouse gases within the ALBA Group by recycling more than 7 million tons of recoverable materials in Germany alone. At the same time, this meant that almost 41.1 million tons fewer primary raw materials had to be extracted from the earth, processed and moved.

#### Opening up new secondary raw materials

We are constantly tapping new material flows and develop their reuse to improve our business and global closed substance cycle waste management. We want to become a key supplier of both novel and established secondary raw materials for industry and commerce. At our location in Eisenhüttenstadt, we created the technical requirements for filtering out and recycling small sections of foil, such as are used in food packaging, from household waste collections. With the investment of around 4 million euros, Interseroh has broken new ground. Up to 6,000 tons of small sections of foil – that up to now could only be used for energy recovery can now be recycled into plastic granulate and reused every year.

#### **Ecological footprint**

We place the highest demands not only on the environmental benefit of our business model but also on its energy efficiency and on our own  ${\rm CO}_2$  emissions. We intend to avoid any pollutant risks for the environment, and the greatest leverage for this is available at our locations with sorting and washing facilities.

In 2012 and 2013, the sorting plants in Eisenhüttenstadt and Berlin saved a total of around 1,150 megawatt hours of energy by repairing compressed air leaks. And through investments of around 250,000 euros for a filter system in Leipzig, we were able to significantly reduce the emissions of smells at the local sorting plant.

In 2013 in Sankt Leon-Rot, our washing store for returnable containers to transport fruit and vegetables replaced mercury vapour lamps and neon tubes with modern LED lamps. This meant that we were not only able to reduce the number of lamps from 796 to only 180 but also cut the power needed for lighting by almost 80 percent (24 kilowatts instead of 116 kilowatts). In 2014, a similar project is being planned for our Mönchengladbach site.





We believe that we are responsible for encouraging sustainability not only in our services but also in our own processes and our entire supply chain. As a result, sustainability criteria are also part of our demands on our approx. 1,900 external service providers.

Over the coming years, energy management systems according to DIN EN ISO 50001 will be introduced at all energy-intensive locations in the ALBA Group. The most energy-intensive location has already completed a corresponding certification in 2013.

#### Responsibility in the supply chain

As a system service supplier for industry and commerce, we coordinate around 1,900 external service providers in Germany alone. In order to implement sustainability along our entire value creation process, we also take care that suppliers working indirectly for our customers within the scope of waste disposal or logistics orders also work in a socially and environmentally responsible way. The ALBA Group has adopted a supplier's code of conduct which is pointed out to suppliers on the Internet as well as during contract negotiations and audits. At the beginning of 2014, we also developed a sustainability questionnaire for suppliers which will be taken into account when awarding contracts in future.

In order to set a good example and to increase the transparency in supply chains which both we and our customers demand, we joined the SEDEX initiative (Supplier Ethical Data Exchange) in 2013. SEDEX is a membership-based organisation for companies that are committed to a continuous improvement of ethical behaviour in their supply chain.

#### Compliance

Through the creation of guidelines that apply throughout the ALBA Group, the ALBA Group Compliance Standards, as well as a supplier's code of conduct, we have not only committed ourselves and our employees to comply with high ethical standards but have also clearly formulated what we expect from our suppliers. The ALBA

Group Compliance Programme that is described in the ALBA Group Compliance Standard was introduced back in 2009 and has regularly been updated since. Our Compliance Programme will be brought more in line with the six main risk groups identified in 2013:



Compliance as a measure to observe statutes, laws and corporate guidelines is a critical element in our corporate philosophy. Six main risk groups were identified within the scope of compliance management.

Last year, online training courses in the fields of cartel law and anticorruption were offered for all employees within the scope of our Compliance Programme. The compliance section on the Intranet has also been revised and reorganised so that it now offers all employees even more help in situations where they have to make tricky decisions.

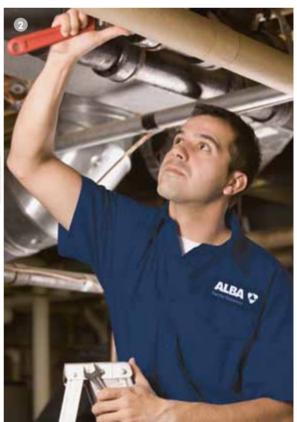
#### **Employees**

The focal points of our personnel development measures in 2013 were the fields of training and further education, employee feedback and talent management. With the strategic goal of encouraging employees, investing in their development and integrating them in sustainability management at Interseroh, we have i.a. updated and extended the range of training. In the coming year, we plan to change the organisation of the further training courses so as to better cater for the needs of employees.

A systematic onboarding programme for structured and targeted introductory training was launched for new employees. We have developed a systematic approach to the large-scale performance of appraisal interviews for all employees within the scope of the sustainability programme.



- 1 Intensive research and development work in the field of plastic recycling
- Engineers and building experts coordinate the services in technical facility management
- 3 Opening of the ALBA Group showroom in 2013 in Berlin



This is to be implemented in 2014. Separate personnel development interviews were held with selected talents, and a segment-specific further training programme 'Service Excellence' was planned.

#### Awareness raising

We believe one of our primary tasks to be the creation of a broad social awareness of the significance of and challenges facing a working closed substance cycle waste management system. In 2013, the ALBA Group opened a showroom for customers, employees and visitors in Berlin. It shall demonstrate and vividly depict the important contribution made by recycling technologies to the sustainability of our cities, industries and society. With the help of animations, monitors and digital applications, visitors see and feel the whole spectrum of a modern closed substance cycle waste management system.

We are pursuing similar goals at our foreign locations. In Poland, we organised our first environmental conference in 2013 and are working together with our customers to raise their employees' awareness of environmental matters through seminars. Last year, we organised corresponding training courses for numerous international groups with locations in Poland

What happens to waste in a modern industrialised nation? How are new raw materials and products made from it? The idea behind Germany's first showroom on the topic of recycling in the ALBA Group is to allow visitors to experience, touch and feel all of this.



### Key data at a glance

Last year, we greatly extended our collection of sustainability key data and also included the sorting plants in the environmental data for previous years. The following selected key data shall provide an overview of the development of our sustainability performance last year.



#### Reduction of water consumption by 18%

-772G2012: 220,465 GJ



#### Only marginal drop in energy consumption

### 7.1 mn.t

2011: 7.7 mn.t 2012: 71 mn t



#### Savings in greenhouse gases through recycling

-25% CO<sub>2</sub>



2012: 510 t 2013: 382 t

#### Savings of 128 t CO<sub>2</sub> from flights

#### Training: takeover share

92 percent of all trainees, apprentices or BA students were taken over in 2013.

92%

2012: 81 % 2013: 92 %



**-9%** 

2012: 1,443 t 2013: 1,307 t



#### Reduction of the volumes of waste

We know how it works. We separated and recycled our own waste volumes (1,307 tons in 2013) using every trick in the book. 95 percent of the waste produced by Interseroh could thus be recycled. What's more, the overall volume of waste could be reduced by 9 percent.

**26.4** %

2012: 25.4% 2013: 26.4%

#### Women in executive positions

The share of women in executive positions at Interseroh has risen once again. 26.4 percent of employees on the first four executive levels were women. We are working on further increasing this share.

1,624

2013: 1,624

#### Employees - we're growing

In 2013, 58 more men and women worked for Interseroh than in the previous year. More and more of them profit from alternative models for working hours. 9.2 percent of our employees worked part-time in 2013.

16.2

2012: 15.1 days lost\* 2013: 16.2 days lost



### Health: days lost

One more day per employee was lost due to illness in 2013 than in 2012. Even if the year in Germany was generally characterised by high illness shares, we are not happy with this and thus continue to work on our offers in health management.

<sup>\*</sup>Figure corrected compared to sustainability report 2012

## Sustainability programme

The following table shows extracts of the progress made in our sustainability programme in 2013. In sustainability report 2014, we will report on the new goals formulated within the scope of the further development of our sustainability strategy.

Field of action	Goals	Deadline	Status
Improving the sustainability performance of our customers	Performing a sustainability-related portfolio analysis and expanding our product portfolio to include social and ecological customer benefits	July <b>2013</b>	Portfolio analysis performed and completed
	Developing a sustainable value proposition for our customers and testing it in pilot projects	October 2013	'Transparency and Efficiency' offer formulated and presented to the first customers
	Conducting sustainability training for all sales staff	July <b>2014</b>	Also scheduled for 2014
Opening up new material flows and developing into a key supplier for secondary raw materials	Significantly increasing tonnages of material flows for the closed-loop method and expanding access to new material flows	December 2013	Goal not achieved, tonnages dropped slightly; but positive prospects for 2014
	Developing customised granulate modifications of plastics for the production of secondary raw materials	December 2013	Goal achieved; new granulates were developed, e.g. to manufacture paint rollers and cans
	Investing in and developing new recycling methods to transfer material flows from energy to material recycling	December 2013	In 2012 and 2013, four million euros were invested in a new plant to sort and further process small sections of foi
Reducing our own ecological footprint	Appointing a sustainability coordinator for all locations	June <b>2013</b>	Sustainability coordinators were appointed
	Introducing a data acquisition system across all segments	September 2013	Data acquisition across all segments established; software optimisation intended for 2015
	Checking all locations with respect to expanding certification in accordance with ISO 14001	September 2013	Check completed; for now, no further certifications planned
	Motivating all employees to suggest improvements in operational environmental protection	September 2013	Suggestions for improvements in operational environmental protection collected; now looking into their implementation
	Analysing significant environmental risks and deriving necessary measures	September 2013	Analysis taking place in the locations
	Creating transparency on our corporate carbon footprint	December 2013	Step by step, until the end of 2014; based on key environmental data collected
	Expanding environmental reporting to all locations in the Services Segment	January 2014	First survey completed in all locations; gradual standardisation of the scope by year-end 2014

Field of action	Goals	Deadline	Status
Responsibility in the supply chain	Performing approx. 100 supplier audits	December 2013	77 audits performed in 2013
	Integrating sustainability in contract award criteria	January 2014	Scheduled for implementation in 2014
	Integrating Supplier Relationship Management (SRM) in the overall Services Segment	December 2015	SRM system implemented in 2013; international roll-out and integration of sustainability audits for suppliers still scheduled
Employees	Optimising health management and expanding nationwide	December 2013	Goal achieved; e.g. through measure such as Weight Watchers at Work, running coaching, flu protection and ergonomic consultancy service
	Establishing an accident information system for a detailed analysis of the causes and as a basis for suitable countermeasures	December 2014	Selection of suitable system began in 2013
	Anchoring the succession plan in the leadership organisation with the help of standardised software systems	December 2014	Talent conferences scheduled to be introduced in 2014
	Establishing online workflow for appraisal interviews and target agreements	December 2014	Concept for IT support of processes completed
	Intensifying further education and training	December 2014	Updating training catalogue, extending offers and expanding the networ of trainers
	Conducting an employee satisfaction survey	December 2014	Also scheduled for 2015
	Preparing a diversity report	December <b>2015</b>	Replaced by other measures
Awareness raising	Continuing the socio-political commitment	ongoing	Measures for socio-political commit- ment are being continued
	Developing a management approach and process for the social commitment of the Services Segment in the ALBA Group	June 2013	Goal achieved; management approach and instruction of organisc tion with specification of goals and measures resolved
	Harmonising the donation and sponsoring guidelines within the ALBA Group, including foreign companies	July <b>2013</b>	Goal achieved
	Reviewing the performance review and continuing measures in the field of social commitment and awareness raising for the topic of recycling and closed substance cycle waste management	December 2013	Measures implemented; on account of the success, continuation and further expansion is scheduled
Compliance	Continuing the compliance trainings	ongoing	Training available online for all employees
	Introducing a compliance management system	December 2014	Implementation of a new Compliance Committee 2013 and intensification of the programme in the identified risk fields

### **Imprint**

#### **Publisher**

INTERSEROH Dienstleistungs GmbH Stollwerckstrasse 9a 51149 Cologne Germany

Phone: +49 2203 9147-0 Fax: +49 2203 9147-1394

www.interseroh.com

### Sustainability contact

sustainability@interseroh.com

You can find the sustainability report on the Internet at www.really-sustainable.com.

#### **Photos**

Pooling location, page 2: ALBA Group Paper bales, page 14: ALBA Group Showroom, page 17: ALBA Group

#### Paper

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