

Environmental Statement 2022





In accordance with EU regulation no. 1221/2009 (EMAS III)

Hettich Holding GmbH & Co. oHG

with the companies in Kirchlengern / Bünde

Paul Hettich GmbH & Co. KG
Hettich Management Service GmbH
Hettich Maschinentechnik GmbH & Co. KG
Hettich Logistik Service GmbH & Co. KG
Hettich Marketing- und Vertriebs- GmbH & Co. KG

The protection of our environment, the protection of the health of our colleagues and the conservation of natural resources are an integral part of our economic success.

We therefore operate according to foresighted sustainability guidelines, thus making an important contribution towards protecting nature and life.

Our principles are:

- introduction of environmentally-friendly and energy-saving production procedures
- resource-saving design of our products
- taking active precautions to prevent interruption of operational procedures
- prevention of waste and ensuring environmentally-friendly disposal of unavoidable waste
- use of environmentally-friendly basic commodities and raw materials
- avoiding and reducing CO₂ emissions
- protecting the health of our colleagues and fellow human beings

This environmental impact statement is a public declaration to our customers, suppliers and colleagues to show that environmental protection is treated seriously by HETTICH in Kirchlengern / Bünde. We are continually developing and implementing our environmental programme. We intend to reduce existing environmental pollution still further and actively promote the conservation of resources. We report at regular intervals on the success of the measures we introduce.

The updated environmental statement for 2022 will be put forward for intermediate validation in 2023.

Kirchlengern/Bünde, July 2022

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1 The Company



Hettich – Technik für Möbel is recognized all over the world. Our concept is based on four main pillars: quality, innovation, closeness to customers and reliability. This is what Hettich stands for; this is what we stand for! These pillars are all of equal importance, ensuring our consistency.

As one of the largest manufacturers of furniture fittings and partner to the furniture industry around the world, Hettich with its kitchen, bathroom, office, living and bedroom furniture fittings sets standards in function, quality and comfort. An internationally active group of companies with over 7,400 employees has evolved under the Hettich trademark. Customers are the furniture industry, specialist dealers with the craft sector and Do-It-Yourself (DIY) branch. Hettich operates production locations in North America, Europe and Asia, and has subsidiaries and local offices around the world. At the company headquarters in Kirchlengern/Bünde/Germany, the group companies mentioned below employed about 2,300 employees in 2021. Many divisions operate three shifts.

Hettich Holding GmbH & Co. oHG (HHO) controls the strategic company development within the Hettich Group, determines the comprehensive environmental principles of the group, and authorizes budgets and large individual projects. The environmental division is a part of the HHO and reports directly to the Holding Management.

The largest company in Kirchlengern is **Paul Hettich GmbH & Co.** (HPH), which develops and produces drawer runners and complete drawer systems in metal for the national and international furniture industry, craft sector and do-it-yourself market.

Hettich Management Service GmbH (HMS) provides internal services to all companies within the group. These services include the preparation of prototypes, customer samples, small batch production, life tests of batch products and prototypes as well as other services, e.g. data processing and the central purchasing activities.

Hettich Marketing- und Vertriebs-GmbH & Co. KG (HMV) is responsible for the sales of all products of the group and is therefore the connecting point between production and customers.





Hettich Maschinentechnik GmbH & Co. KG (HMT) is the company responsible for the construction of special purpose machines. It develops and manufacturers assembly machines, robot cells, welding devices and other special purpose machines, not only for the Hettich Group but also for the automotive, electrical and building hardware industry.

Hettich Logistik Service GmbH & Co. KG (HLS) runs the incoming goods departments for finished products and commodities, their storage, picking and transportation packaging. Goods are delivered exclusively by external transport agents.

The property of the site Kirchlengern is located in an industrial area. The premises are bordered to the east by a public swimming pool, to the west, south and north are residential and industrial facilities. Immediately adjacent to the premises in Kirchlengern is the HLS logistics centre (In der Lohge 50, Bünde), which is integrated into the overall processes in Kirchlengern. In addition, it also carries out logistics functions for the entire Hettich Group. North of HLS, the production hall C2 was built by HPH. North of HLS, the production hall C2 (In der Lohge, Bünde) was built by HPH, next to which another production hall C3 is planned.

The premises are not located in a designated nature reserve. A stream called Markbach which empties into the river Else, flows adjacently to the premises. The flood plain of the river Else extends to a railway embankment which borders the company premises on the southern side. The designated flood plain is mostly declared as nature preserve. Here the railway track forms the border of the nature preserve, too. The river Else itself as FFH area (according to the European Habitats Directive) is an important ecological habitat.

Although the company is not located in a direct nature reserve, we do our utmost to reduce emissions as far as possible with a complex plan of measures (e.g. by upstands in the delivery area of hazardous substances, lockable restraining devices, mobile sewer sealing systems and emergency sets, training of our colleagues, regular inspections and audits and practical simulation of trained emergency procedures). Hereby we could always safely prevent emissions of hazardous substances into the soil, the ground water, gullies or even into one of the above-mentioned nature reserves.

The validation and this updated environmental statement refer to the six organisational units of the Hettich Group mentioned above which are located in Kirchlengern / Bünde.

2 Environmental Management

2.1 Sustainability guidelines

The Hettich Group of Companies accepts its responsibility for the conservation of natural resources and for health and safety at work for all employees. This is particularly reflected in the following aspects:

- We include environmental protection and occupational heath and safety in the company mission statement.
- We develop furniture fittings that meet the highest standards of quality, safety, environmental sustainability and energy efficiency. These characteristics are also included in the designing of the production processes and procurement of production facilities.
- We understand energy efficiency in all our activities as an integral part of environmental protection.
- We regard **environmental protection** and **occupational health and safety aspects** as separate criteria in all relevant processes, preferably in quantifiable form.
- We provide an effective environmental protection and occupational health and safety organisation and necessary information, human resources and budgets.
- We ensure the implementation of necessary measures through environmental and occupational health and safety committees.
- We review hazardous situations and the company's emergency response plans at regular intervals and update them where necessary.
- We commit ourselves to annually defined **environmental and occupational health and safety targets** and review the performance within the framework of a management review.
- We regard **legal requirements**, relevant **standards**, further **obligations** and the state of the art as minimum requirements.
- We see **continuous improvements** in the sustainable reduction of energy consumption, avoiding environmental pollution, health risks and hazards in workplace as a compulsory part of the corporate culture.
- A successful **environmental and occupational health and safety management** requires responsible employees at all levels. We support the active participation with appropriate initial and further training.
- We involve **suppliers**, **service providers** and **customers** in our endeavours regarding environment and occupational health and safety.
- We maintain, through information and cooperation, a relationship with the **general public** and local and national **authorities** that is characterized by frankness and trust.



2.2 Description of the environmental management system

The environmental management system applies and implements the environmental principles and goals defined by the Managing Directors of HHO. This guarantees that the goals defined in the EMAS III are maintained, the operating licence is received and official requirements are fulfilled when operating the production facilities. The application of the environmental management system also guarantees that negative impact on the environment is prevented, or at least reduced, in the best possible way for all activities.

All management systems were combined into Hettich's integrated management system (MSH) including the environmental management, occupational safety management, quality management etc. In so doing, consistent higher-level processes are applied all over Hettich Group.

All colleagues, particularly management personnel, are responsible for the implementation of the management system. As representative of all companies at Kirchlengern site, the Managing Director of Paul Hettich GmbH & Co. KG has been given the authority to make decisions on environmental management issues, in the common interest, for the entire site.

Legal compliance, e.g. with respect to their significant environmental impact, is ensured through internal regulations. All occupational health and safety and environment-related changes are checked continually by an external service provider and provided to us with comments.

The colleagues in Kirchlengern / Bünde are integrated in several different ways into the environmental management system. This is done via the continual improvement processes, the corporate suggestion for improvement system, the Hettich Connect Community, the environmental committee, target agreements, the environmental programme and a data file containing environmental documentation, which can be accessed by all colleagues having PC work stations.

Employees are designated within the environmental management system, who are responsible for monitoring the environment-related areas assigned to them. Their area of responsibility covers the entire location. They report directly to the Managing Directors. The organisational integration of all functions that are concerned with environmental protection (environmental management representative, waste management officer, water protection officers, etc.) is shown in the following organisational chart (figure 1).

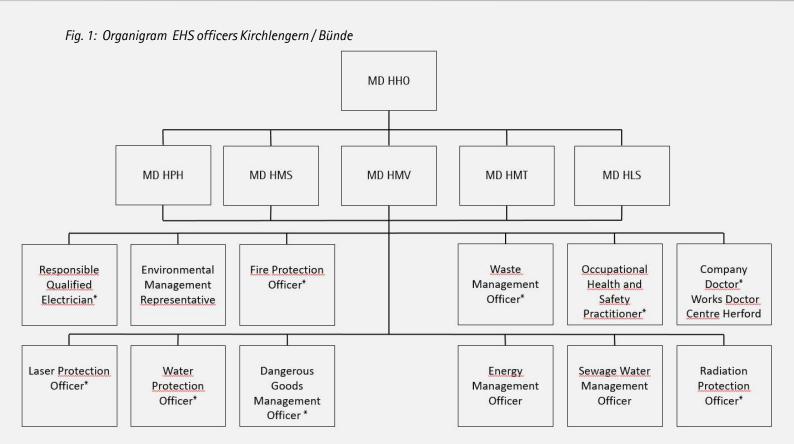
Interested Parties

An evaluation has shown that the following interest groups are involved in shaping relevant requirements for the MSH:

- external customer B2C
- external customer B2B
- internal customer (marketing company)
- internal customer (manufacturing facility)
- company management
- legislators and authorities
- normative institutions
- employees
- external suppliers
- external provider
- internal supplier/service provider

The individual requirements and their operational implementation by the MSH can be viewed in our Management System Manual.

2 Environmental Management



^{*} The assignment is legally required

2.3 Eco-Audits

Eco audits or inspections are carried out regularly in order to evaluate the environmental efficiency of our company and to continually improve the environmental protection programme. We check whether environmental management activities are in accordance with the environmental programme, that operational procedures correspond to the environmental management system, and that the environmental management system is suitable enough for effective implementation of the environmental principles in the company.

In addition to evaluating the environmental management system, the eco audits or inspections check whether the environment-related activities conform to the existing environmental legislation and the EC Eco-Audit directive (EMAS III) and ISO 14001:2015.

An environmental audit is carried out once every three years for the entire site at Kirchlengern / Bünde. An interim audit is also carried out every year in order to check and determine the effectiveness and functional integrity of the environmental management system. The Environmental Management Representative, site Kirchlengern / Bünde, is responsible for performing and co-ordinating the Eco-Audit and the interim audit.

The eco audits or inspections are carried out by means of an audit plan and comprise interviews, documentation checks and inspections. Checks are carried out using function-specific protocol checklists in which findings, measures and implementation deadlines are documented.

3 Environmental Aspects of our Activity

3.1 Environmental relevance of the companies

Paul Hettich (HPH)

The production techniques used in Kirchlengern / Bünde require the use of cooling and lubricating fluids, oils, chemicals and other operating materials. These materials are defined as water-endangering and hazardous materials and appropriate safety precautions are required. These materials are potentially hazardous to the environment and are stored and used in specially equipped storage areas and production plants in accordance with the statutory requirements.

Raw commodities and material-related aspects are linked directly to environmental protection through the production processes and plant-related aspects. A reduction in the environmental pollution can only be achieved if serious consideration is given to all aspects during the development phase for products and plants. Due to the product characteristics a very good recyclability is given (indirect environmental aspect).

Different production processes are applied in the Kirchlengern site in the production of drawer runners and drawer systems at HPH.

Drawer runner production

The strip steel used as raw material for the production of the drawer runners is processed using presses and profiling and punching systems. This equipment has particular environmental relevance as hydraulic oil as well as cooling and lubricating fluids are used.

The pre-manufactured basic components are partly assembled by welding machines or laser welding systems. Finally, the components are assembled into drawer runners in automatic assembly machines and by robots.

Drawer production

After being pre-manufactured on pressing/bending/welding systems, they are first cleaned and pre-treated for powder coating. This is done by means of acid degreasing, followed by cascade washing.

After the drying process, the cleaned drawers are sent to the low waste and low emission powder coating. The components are then fitted together, partly by robot, into pre-finished complete drawers.

Drawer profile production

This production is carried out by profiling and punching as well as assembly systems with high-strength and energy-saving joining technology. The powder coating is done in the same way as described for the drawers.

The resulting cleaning and rinsing water used in the pretreatment is treated in the company's own sewage treatment plant.

Table 1 shows the annual amount of products.

Table 1: Products HPH – Drawer runners and drawers

	Products [t]
Period	2021
Drawer runners and drawers HPH	138,958

3 Environmental Aspects of our Activity



Hettich Maschinentechnik (HMT)

HMT develops and produces custom-built special purpose machines for internal and external customers. The use of classic metalworking applications is comparatively low. Furthermore assembly operations of special machine constructions dominate.

In 2021, the number of hours worked increased by approximately 9 % compared to 2020 due to the higher order situation.

Table 2: Products HMT - Working hours

	Working hours
Period	2021
Industrial HMT	74,627.72

Hettich Management Service (HMS)

In prototype and small batch series, HMS uses lathes and milling machines as well as plastic injection mounting plants to process metal, wood and plastic. Furthermore, presses and other machines are also used for sheet metalworking. The departments Corporate IT (computer systems) and Facility Management (support for cooling systems, emergency power generator, combined heat and power plants) are also located at HMS.

Hettich Logistik Service (HLS)

At HLS logistics processes are developed in carefully coordinated time windows with the help of modern technology and software systems. In addition to the processing of incoming goods and warehousing of products, a focal point is the dispatch of goods to customers and subsidiaries with formation of packages (see Table 3). The significant environmental relevance of HLS lies in the use of transport packaging. With regard to the indirect environmental impact, the special importance lies in the selection of the transport routes and the logistics service provider.

The number of packages at HLS increased by approximately 11 % due to the higher order situation.

Table 3: Products HLS - Packages

Period	Packages 2021
Packages HLS	678,267

Hettich Holding (HHO)

HHO carries out purely administrative tasks. No activities are carried out that are of particular environmental relevance. The main focus of HHO is on intergroup tasks. In this connection, the principles for the company group are developed.

Hettich Marketing und Vertrieb (HMV)

HMV is a sales company. The main environmental pollution here comes from the sales representatives who cover long distances each year using company cars. (see table 16 and 17).



3.2 Determination and monitoring of important environmental aspects

All environmental effects of our company are gathered according to the requirements of EMAS III and evaluated regularly concerning possible measures. From this, targets are derived (see table 5 and 6).

The following table shows a summary of the results. These results depend on the assessment of importance with the levels "high", "average", "low". Only those environmental aspects, which are considered as being important with at least average effects, are shown here. The assessment is carried out by an expert determination on the basis of the following aspects:

Frequency of appearance

How often is the input material used or the output material emitted?

Consumption rate / Output rate

How high is the consumption rate / output rate?

Environmental damage potential

Which impacts on the environment can be expected? At this, direct as well as indirect impacts are considered (e.g. emission for the power generation).

Controllability - normal operation

How good are the changes recognisable at normal operation?

Normal operation condition: Plant works without fault, all security and control systems are fully functional.

Controllability - Special situations

How good are the changes recognisable in special situations (in the event of fault, system failure, fire, catastrophes)?

Control potential

How is the scope of influence for the improvement of environmental impacts assessed?

Compliance with legal requirements

How intensive are legal requirements adhered to (e.g. from legal requirements, requirements of regulatory approvals and other obligations)?

We consider the life cycle in the assessment of environmental aspects (see following table). Environmental aspects are already taken into account in the development of new products. Environmental aspects are also identified in subsequent processes such as purchasing, production, use and disposal. The resulting environmental impacts are controlled via management processes and environmental programme points.

Evaluation system:

Frequency (=1-5) Evaluation of environmental aspects only comparative for the site

Quantity (=1-5)

Controllability (=1-3) e.g. low controllability means a high environmental relevance and thus "3"

Result = frequency x quantitiy x controllability

Low level 1 - 24 points Medium level 25 - 49 points High level 50 - 75 points

The evaluation of chances and risks results, among other things, in the result of the assessment of environmental aspects.

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3 Environmental Aspects of our Activity

Table 4: Important environmental aspects Kirchlengern/Bünde

Life cycle stage	Activity/Product	Environmental aspect d: direct, type i: indirect, type	Frequency	Quantity	Controllability	Result of the calculation	Result of the evaluation	Explanation
Develop- ment	Construction	i: Emission control	3	4	1	12	low	No energy, area or material consumption; no emissions
	Profiling Disposal of cooling lubricants	d: Waste disposal	5	2	1	10	low	Frequent use, but good contollability
	Profiling Steel consumption	d: Resource consumption	5	5	1	25	medium	High consumption volumes and high indirect environmental impacts, but good controllability
	Profiling Power consumption	d: Energy consumption i: Resource Consumption	5	5	2	50	high	High consumption and high indirect environmental impacts
	Assembly Power consumption	d: Energy consumption i: Resource consumption	5	3	2	30	medium	High consumption and high indirect environmental impacts
Product manufacturing	Drawer and drawer profile production Powder consumption Gas consumption	d: Energy consumption d: Resource consumption i: Resource consumption	3	3	2	18		Good contol potential and average consumption; quantity valuation based on primary energy
Product	Transport Fuel consumption	d: Resource consumption i: Resource consumption i: Traffic emissions	5	3	1	15	low	Indirect, since transport via forwarding agents; average consumption and good controllability
	Transport accident at delivery of hazardous material	d: water/soil contamination	1	3	1	3	low	Low consumption and good controllability
	Properties and buildings Power Consumption	d: Energy consumption i: Resource consumption	5	2	1	10	low	Low consumption quantities for basic building functions and good control potential
	Premises and buildings Heat consumption	d: Energy consumption i: Resource consumption	2	2	2	8	low	Only seasonal consumption, which is also low due to good building structures
phase	Mechanical products	none						No energy, area or material consumption; no emission
Utilisation phase	Electrical products	d: Energy consumption	2	1	1	2	low	Only a small proportion of electrified fittings; low power consumption per unit
Disposal	Products	d: Recycling i: Resource consumption	1	5	1	5	low	Very durable and long-used consumer goods. All products are put into the disposal process. The good controllability results from the choice of the product material (steel/plastic for drawers). Steel can be recycled >95% without loss of value.



3.3 Environmental goals and programme

We have drawn up an environmental programme in order to implement our environmental principles and achieve our future environmental goals. The concrete measures are defined and project officers are assigned to ensure implementation. The achievement of the environmental goals will be guaranteed through the timely implementation of the individual points of the environmental programme.

The programme points agreed by the management are be entered in a three-year list (EMAS audit cycle) and their status will be updated. The new environmental programme points suggested by the environmental committee will be agreed by the management and will be checked at the next appointment with the environmental advisor. The environmental points that have not been completed at the end of the three-year period will be carried forward into the next environmental programme. Previous experience has shown that, through this procedure, there is a significantly higher implementation rate in the environmental programme.

The environmental goals and measures will be checked and updated in the interim audit and in the environmental audit. Furthermore, the Environmental Management Representative and the other company officers work towards achieving the environmental goals and their implementation is monitored by the environmental committee.

The Environmental Management Representative is responsible for monitoring and ensuring that measures are carried out on schedule. She reports to the Managing Director and the environmental committee.

We have transferred the pending points of the former programme to our new environmental programme (2021–2023) and added further points. At the time of the revalidation in July 2022, 6 new points have been added.

An energy efficiency team of qualified employees from different specialist departments has been put together to analyse all areas and work out possible areas of improvement. Furthermore supplementary energy efficiency audits have been introduced within the scope of a proven production management method (TPM). Due to this, further savings in power consumption could be achieved. We continue to analyse potential (see environmental programme) and in so doing we expect a considerable reduction, especially in the amount of power consumed. This is also reflected in the environmental targets achieved last year and the current year for this area alone.

3 Environmental Aspects of our Activity

Table 5: Completed activities until July 2022

Environmental aspect	Environmental target / measure	Referen ce year	Responsible (Company)	Date	Status
Energy consumption	The lighting in building C2 is to be converted to LED.	2020	Facility Management (HMS)	08/2021	Project is completed. 443,000 kWh per year are saved.
	By automating the roof domes in building B5, exhaust air systems can be switched off.	2020	Facility Management (HMS)	06/2021	Project is completed. The actual savings are still being determined.
	The powder coating of a product is to be changed to a single-coat application. This will save 330,000 kWh.	2020	Technical project planning (HPH)	09/2021	The project was successfully implemented.
Resource consumption	Product optimization of the runner centering system saves approx. 50 tons of material (POM) per year.	2020	Technical project planning (HPH)	05/2021	The project was successfully implemented.
	The powder coating of a product is to be changed to a single-coat application. This will save approx. 17 tons of powder coating per year.	2020	Technical project planning (HPH)	09/2021	The project was successfully implemented.
	Changing an adapter to a thinner material saves 81 tons of steel per year.	2020	Technical project planning (HPH)	05/2021	The project was successfully implemented.
CO ₂ emissions	By replacing a chiller, a refrigerant with a lower $\mathrm{CO_2}$ equivalent is used.	2020	Facility Management (HMS)	08/2021	The implementation has taken place. This saves emissions of 1099 kg CO₂e per kg refrigerant.



The following table summarises the pending and the new environmental goals.

Table 6: Environmental goals

Environmental aspect	Environmental target / measure	Referen ce year	Responsible (Company)	Date	Status
Resource consumption	The conversion from chemical to inductive paint removal leads to a 100 percent saving of chemical paint removal agents.	2018	Production Manager (HPH)	09/2022	Project is in the process of implementation. Implementation date was postponed due to delays in technical implementation.
Energy consumption	The lighting in building A8 is to be converted to LED.	2020	Facility Management (HMS)	12/2022	The project will be implemented in stages in 2022 due to ongoing operations.
	The photovoltaic system on production hall B7 is to be expanded by a further 230 kW peak.	2021	Facility Management (HMS)	06/2022	Project is in the process of implementation.
	Two additional photovoltaic systems with up to a maximum of 2,000 kW peak per system are to be installed on the roof of the new C3 building.	2022	Facility Management (HMS)	06/2024	Project is in the planning stage.
CO ₂ emssions	By optimizing a logistics process, the goods are to be transported directly to the customer without intermediate storage. This will save approx. 6,700 km of transport distance.	2021	Technische Projektierung (HPH)	12/2024	Project is in the planning stage.

The development of the operational environmental protection over the last years is described below and illustrates the environmental performance of our company site. In order to be able to illustrate the changes effectively when compared to the previous years, we have introduced relative environmental performance values. The raw materials used (strip steel, powder paint and wood panels) have been taken as reference sizes when determining these values. On the one hand, the environmental performance values allow the effectiveness of environmental relief measures to be illustrated without being influenced by production variations. On the other hand, meaningful environmental performance values assume at least a constant product and process spectrum on the site.

The table below summarizes the development of index values compared to the previous year:

1. Specific amount of waste	+ 8.4 %
2. Recection quota wood panels	+ 20.9 %
3. Specific water consumption	- 8.6 %
4. Specific power consumption	- 4.6 %
5. Specific gas consumption	- 13.7 %
6. Specific heat consumption	- 16.8 %
7. Specific CO ₂ emissions	- 14.1 %

Problems with the significance of environmental indicators can occur as a result of delayed production activities. It must also be noted that material thicknesses have been reduced (specific product weight) over the last years. This can have an adverse affect on the environmental performance values, as more product items are produced from the raw materials. Also because of production-related changes on the site in the last years (e.g. energy-intensive laser welding plants, increased use of transfer lines or sharply increased, energy-intensive use of robots, increased office technology, increased single layer powder-coating,...), the performance values are in some cases pushed to the limits.

With the adjustment of the management system to EMAS III, a few core indicators (CO_2 emissions, waste generation) have also been adjusted. Many of the newly required indicators have been a fixed part of the management review of Hettich for many years. From the measurement of greenhouse gases and the other emissions into the air, it is clear to us that only the CO_2 emissions which have also been taken into consideration in the last few years have a corresponding relevance.





4.1 Raw commodities and operating materials

Various raw commodities and operating materials are required either directly or indirectly in the production of our products, the operation of production systems, for packaging the products, etc. The purchasing of the raw commodity amount and the operating material amount is in line with the increase in production in 2021.

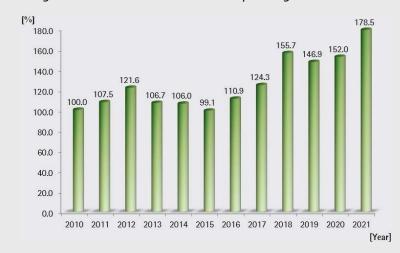
Table 7: Raw commodities and operating materials - 2021

	Raw commodities and operating materials[t]	
Period	2021	
Raw materials (steel, wood panels, powder paint)	140,910	
Operationg materials (e.g. oils/grease, chemicals, cardboard packaging)	9,265	
Total raw and operating materials	164,811	

The European regulation on chemicals "REACH" (Registration, Evaluation and Authorisation of Chemicals) came into force on 1 June 2007. This has meant a comprehensive revision of the applicable chemical regulation. It is not only the chemical industry that is affected but also the so-called "downstream users", to which the Hettich companies in Kirchlengern / Bünde belong. They are obliged to use the chemicals and preparations only as indicated by the manufacturer. If different uses are required, the manufacturer must be requested to apply for this or the user himself must register such uses with the authorities. Furthermore bans on substances are controlled through REACH.

All necessary checks and measures have been carried out or introduced in our companies in Kirchlengern / Bünde, in order to fulfil the REACH requirements, also in relation to suppliers and customers.

Fig. 2: Use of raw commodities and operating materials



4.2 Waste

Total amount of waste

A waste sorting system has been put into practice in Kirchlengern / Bünde covering at present 37 types of waste. The annual amounts are registered and documented both in a waste balance sheet and in the annual report from the officer waste disposal. The different types of waste are separated by type and collected for disposal in suitable containers located on the company premises.

New disposal companies are integrated into our environmental principles right from the start. The strict environmental requirements demanded in the invitation to tender are confirmed before the contract is awarded

by proof of certification in accordance with the Disposal Specialist Companies Ordinance of the disposal company.



Within the scope of waste disposal, we keep on working exclusively together with certified specialised waste management companies.

A large portion of the waste produced by us can be recycled and brought back into the economic cycle. The recycling rate is 98 percent.

Due to the increase in production, the total volume of waste increased by approximately 16 percent in 2021. Table 8 shows the annual amount of waste for 2021.

Specific amount of waste

The presentation of the specific amount of waste (fig. 3) has been adjusted by the disproportionately represented scrap. Due to various product ramp-ups and adjustment of stocks, an increase in the specific amount of waste can be observed in 2018 and 2019. Since 2018, the figure is shown adjusted.

Fig. 3: Comparison figures - Specific amount of waste



Please note: The adjusted waste quantities include waste from product ramp-ups, additional packaging, special waste disposal products and trays

The product content is made up of three main groups: steel, powder coating and wood panels.

Table 8: Essential types of waste - 2021

	Waste [t]
Period	2021
Powder paint	58
Mixed scrap	12,382
Cardboard packaging	862
Waste wood	286
Plastic	71
Other waste	236
Total amount of "non-hazardous waste"	13,877
Paint sludge	189
Phosphate water	370
Emulsion	89
Waste oils	10
Operating materials containing oil	16
Total amount of "hazardous waste"	674



4.3 Water and sewage

Process water is used mainly for cleaning and degreasing in the drawer and runner production (halls A8/B4/B5/B7/C2) in Kirchlengern/Bünde. Furthermore smaller amounts are used for the cooling lubricant supply for the profiling systems.

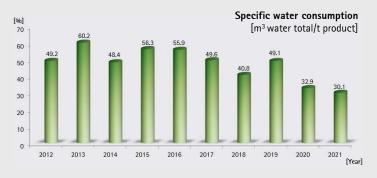
During previous years, evaporative cooling plants were put into operation for cooling. As a result the water consumption increased during summer months.

Table 9: Water consumption - 2021

	Water consumption [m³]
Period	2021
Sanitary water	14,885 ¹⁾
Process water (A8/B4/B5/C2)	7,538
Total consumption	22,423

¹⁾ incl. process water B7

Fig. 4: Comparison figures – Specific water consumption



Water consumption

Absolute total water consumption increased in all areas compared with the previous year. This is mainly due to the increase in production.

However, specific water consumption (see Fig. 4, in m³ total water/t product) decreased by 8.6 percent compared to the previous year. Through a regular "Jour Fixe", consumption is analyzed and measures derived.

Waste water

Waste water accumulates in the form of production, sanitary and precipitation rainwater sewage. The production and sanitary sewage is discharged into the sewage system that is connected to the local sewage treatment plant in Löhne.

In Factory A, there are three large capacity underground rainwater retention systems that relieve the receiving water in case of heavy rainfall. The twin flow channels near A3, A8 have volumes of 690 m³ and 302 m³ respectively. The backwater channel at the building extension of A5 has a volume of 28 m³.

The part of the precipitation water coming from the roof area in factory B is passed through a surface seminatural retention reservoir with a volume of 400 m³ and then discharged directly into a small watercourse (receiving water). For the precipitation water of B7 there is an additional above-ground retention pond with a volume of 1,200 m³.

The water from the roof area of the high-rack storage C1 is retained by a surface backwater reservoir with a volume of 610 m³ and a subsurface backwater channel with a volume of 27 m³.

Table 10: Waste Water - 2021

	Waste water	
Period	2021	
Sanitary water	14,885	
Waste water from treatment as well as full desalination plant	4,914	

The difference between process water consumption and waste water evaporates due to the water and component temperature as well as the large surface of the product in the area of the pre-treatment plant and in drying the drawers before the powder coating.

The sewage treatment plants comprise a neutralization, a flocculation and a filtration.

The surface water of the paved yard areas and the picking hall collect in a surface seminatural retention reservoir with primary clarifier and 1,400 m³ impoundment volume, before draining off into a receiving water course.

The rainwater from factory C2 accumulates in a surface retention reservoir (1,245 m³) before draining off into a receiving water course.

The waste water from the production results exclusively from the drawer production (HPH). The water is then treated in the company's own waste water treatment plant before being routed into the public drainage system.

Samples are taken to ensure that limit values are observed (see table 11).

The sewage treatment plants are monitored through our own and official measurements, maintenance work, regular inspections and visual checks. The concentration of substances discharged from the sewage treatment plants into the public sewage (direct discharger) results in the following annual load (calculation based on three measuring reports predetermined from public authorities for each sewage treatment plant from 2021, see table 11) for the subsequent communal sewage treatment plant.

Table 11: Waste water load of the sewage treatment plants B4 and C2 in 2021

Waste water load and limit values of sewage treatment plant				
Parameter	Unit	Value determined ø	Limit value	Annual load [g/a]
AOX 1)	mg/l	0.075	1	369
LHKw ²⁾	mg/l	0.01	0.1	49
Zinc	mg/l	0.1	2	491
Hydrocarbons	mg/l	1.46	10	7.273

¹⁾ Absorbing organically-linked halogenates

²⁾ Low volatile halogenated hydrocarbons







4.4 Energy

For heating of buildings and degreasing baths, district heating is procured on site Kirchlengern/Bünde from a district heating plant that generates electricity as well as heat (combined heat and power).

Natural gas is the most important source of energy that is used to generate heat in the production facilities (baking furnaces in the powder coating as well as heating the paint removal baths) and for the combined heating and power stations A5, A8, B7 and C2 as well as for the peak load boiler A5 und C2. Des Weiteren erfolgt die Beheizung des 2006 in Betrieb genommenen Logistikzentrums über Erdgas. The Logistics Centre which came into operation in 2006 is also heated by natural gas. A special feature here is the efficient gas-infrared heating system in the picking area.

The electricity mostly is supplied from the public grid. Since 2007, power is supplied via medium-voltage lines between the transformer substation and the factory.

Energy savings with new buildings

The Hettich new buildings are outstanding due to a farreaching consideration of energy and ecological aspects. This includes all areas such as use of energy, building material and area consumption. As an energy-neutral building, the Hettich Forum serves as a model for a sustainable, futuristic building design. The insulation which is 40 mm thick consists to a large extent of environmentally-friendly cellulose material.

The requirements set by the company and the experience gained in the context of the Hettich Forum have also been used in the 14,000 m² production hall C2 and B7. The sustainability features include a façade wich is predominantly designed of wood (renewable and CO2 binding building material) and a heating requirement far below the requirements specified in the German building regulation (EnEV). Furthermore, the electricity consumption for lighting was reduced by approx. 70 percent compared to normal lighting.

The photovoltaic system with an installed capacity of 250 kW on the roof of B7, which was connected to the grid in 2018, is also part of the sustainability concept.

The sustainability properties of the buildings have led to Hettich being awarded the Industrial Constuction Prize for Sustainable Building in 2018. The new buildings are a sustainable contribution to responsible industrial construction in terms of production logistics, energy technology and building typology.

Energy generation

Since the commissioning of the company's own photovoltaic system on the Hettich Forum, electricity of up to 31,664 kWh/a has been generated per year. This means that the target of 25 MWh per year has been significantly exceeded. In the past year the target value has been exceeded again by generating 27,000 kWh durch die Kraft due to the power of the sun.

Furthermore, the photovoltaic system B7 has been put into operation in February 2018 and generated 214,967 kWh of power in the previous year.

Heat is generated at the site by four CHP units and four boilers. If needed, two of the heating boilers can be fueled by oil. For this purpose two oil tanks each with a capacity of 50,000 litres are available.

As for ecological reasons the heating boilers are preferably fueled by gas.

Three heat pumps (one air-source heat pump and two water-water heat pumps) were also installed in production hall B7. The water-water heat pumps use the waste heat from cooling for heating processes. The air-water heat pump is used for cooling and heating processes, depending on the weather conditions.

Energieverbrauch

Absolute electricity consumption increased by 13.0 percent, significantly less than the increase in products. The site in Kirchlengern/Bünde has grown steadily in recent years. As a result, approximately 49,000 m² more space has to be supplied with energy (lighting, ventilation, cooling) compared to 2012.

On the positive side, the additional heating requirements are so low due to the highly heat-insulated wood frame construction of the building expansions, that they are hardly noticeable in the overall statistics.

Proportion of renewable energies in energy consumption

The amount of heat generated by combined heat and power including used waste heat adds up to 5,761 MWh. The amount of self-generated electricity is 2,944 MWh (see Table 12).

Since 1 January 2017 the site in Kirchlengern/Bünde exclusively obtains certified clean power (water and wind energy as well as other renewable energy sources such as solar and bioenergy).

Apart from the second photovoltaic system, which has been put into operation on the production hall B7 in 2018, this is a possibility for Hettich Group to push forward the subject of renewable energies.

Table 12: Own energy generation - 2021

	Own energy generation [MWh]
Period	2021
Power CHP (B7)	27.6
Power CHP (C2)	215
Power CHP (B7)	461.5
Power CHP (C2)	1,717.8
Power CHP (B7)	302.5
Power CHP (C2)	219.8
Total power	2,944.2



Table12: Own energy generation - 2021 (continuation)

	Own energy generation [MWh]
Period	2021
Heat solarthermics (B1)	1
Heat 2 CHP plants (A5)	2,877
Heat 2 heating boilers (A5)	3,584
Heat CHP plant (C2)	303
Heating boiler (C2)	508
Heat central compressed air system (C2-1)	216
Heat central compressed air system (C2-2)	10
Heat central compressed air system (B8)	1,645
Heat CHP plant (B7)	556
Heat air-water heat pump (B7)	68
Heat water-water heat pump (B7 – 1)	30
Heat water-water heat pump (B7 – 2)	54
Total heating	5,761

Table 13: Primary energy consumption – Comparison 2021 to previous years

	Energy consumption		
	Change compared to previous year [%]	Change compared to 2019 [%]	
Power 1) [MWh]	+ 16.9	+ 10.7	
Natural gas ²⁾ [MWh]	+ 2.2	+ 4.0	
Heating oil [MWh]	3)	3)	
Total	+ 7.7	+ 6.0	

¹⁾ Obtained from public grid without own power generation CHP A8, CHP A5, CHP C2 and the photovoltaic system B1, B7.

²⁾ Gas consumption in the drawer production HPH and the CHP A8, A5, B7 and C2 as well as the heating of the Logistics Centre and the central heating plant A5, peak load boiler C2 and heating boiler B7.

³⁾ No oil consumption in the previous years. In 2016, residual quantities were used up in order to be able to clean and maintain the oil tank.

Power consumption

Conflicting aspects which unfortunately cannot be reasonably quantified and offset have made it more difficult to continue to decrease power consumption over the last years, in such areas as:

- continually increasing use of technology (e.g. laser welding)
- sharply increasing automation (e.g. use of robots, transfer lines, ...)
- increasing number of cooling systems (buildings and machines)
- increasing number of administrative and logistical areas which initially affect the key figure in an adverse way, as they do not produce any product tonnages.
- increasing number of ventilation systems (ventilation of halls and extraction systems on machinery and plants)
- increasing office technology (computers, telecommunications, etc.)
- increasing product efficiency (i.e. optimization of product materials where, for example, the same amount of powder coating is required, but they represent less "product tonnes")
- new profiling systems

In 2021 our comprehensive efficiency measures have been able to compensate for this trend. However, without these different measures there would have been an even more considerable increase in power consumption. In particular, the series start-ups of new products and the significant hall expansions and new buildings drove up power consumption per product tonnage.

Furthermore we have invested a lot in improving indoor climatic conditions for the employees in the past. Due to the new ventilation and extraction systems on site the power consumption caused by ventilation adds up to approx. 3 percent of the total consumption.

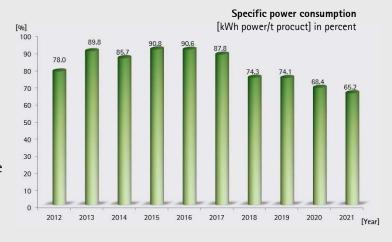
To improve the comprehensibility of the energy consumption development on site Kirchlengern/Bünde, a meter concept was planned and partly implemented in the last years.

The first implementation step makes it possible to capture energy data per production area and among that even for the most important energy consumer per energy source (power, gas, water, heat, compressed air). For this purpose a wide range of sub meters was installed.

Since 2015 we are able to automatically read all electricity meters.

In the second stage of expansion plant-related meters have partly been installed, which make it possible to measure the total energy consumption per production area. Here, the meter data is recorded via software. The visual processing of the recorded data is currently still being adapted.

Fig. 6: Comparison figures – Specific power consumption





Gas consumption

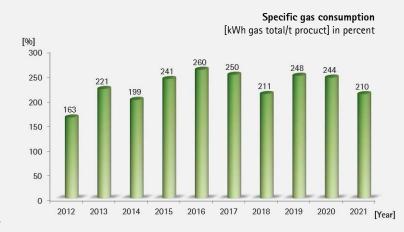
The absolute gas consumption has increased by 2.2 percent when compared to the previous years (see table13). This is due to an increased product throughput in the powder furnaces.

The specific gas consumption decreased by 13.7 percent during the same period (see fig. 5).

After the commissioning of the powder plant in B7, a leap can be noted in 2019, which is mainly due to the start of series production and the associated start-up difficulties. By optimising the powder layer thicknesses, it has been possible to reduce the powder quantities in recent years, while at the same time increasing the number of units. However, this has resulted in an increase in specific process gas consumption (MWh process gas/t powder coating).

Measures have already been defined here to reduce the heat discharge from the curing ovens and thus lower energy consumption.

Fig. 5: Comparison figures – Specific gas consumption



Heat consumption

Absolute heat consumption in recent years has not increased further compared to 1997, despite a 461.5 percent increase in production.

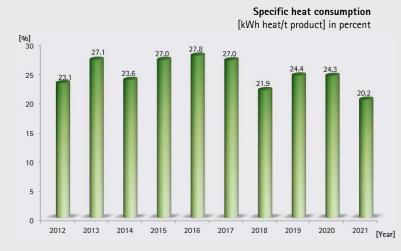
The excellent result can be traced back to the holistic energy concept which has begun in 1998 with the former energy contracting associated with the necessary extensive changes, plant replacements and different measures for the use of surplus heat, as well as the centralized compressor station with heat extraction.

This energy concept is pursued to this day by using and expanding cogeneration of heat and power and using waste heat on ventilation systems and compressor units when possible.

The specific heat requirement decreased by 16.8 percent compared to the previous year.

Compared to 1997, the specific heat consumption could be reduced by approx. 80 percent.

Fig. 7: Comparison figures - Specific heat consumption



Please note: The key figure has been slightly changed in 2013 by also including further small heat generators (e. g. CHP A8 and C2) in the result.

4.5 Exhaust and noise

Exhaust emissions

On site Kirchlengern/Bünde one plant is subject to the licensing requirement laid down in the Federal Ambient Pollution Control Act. As the CHP plant in A5 which was built in 2015 has a district heating output of more than 1 up to less than 20 MW, a licence according to the Federal Ambient Pollution Control Act read in conjunction with the fourth Federal Ambient Pollution Control Regulation is required.

The air emissions, which must be determined every three years, are presented in table 14 and clearly undercut.

The gas heating of the paint removal plants and the baking furnaces B4/B5, B7, A8 and C2 as well as the space heating boiler and the particularly energy efficient gas infrared heating of the new Logistics Centre can be cited as relevant emission sources. These fall far below the limit requirements of the first Federal Emission Control Regulation.

Apart from CO_2 emissions in power and heat generation, no other significant greenhouse gases have been emitted. The absolute CO_2 emissions have increased by 1.7 percent compared to the previous year.

Table 14: Air emissions of the CHP plant in A5 according to Federal Control of Pollution Act in 2020

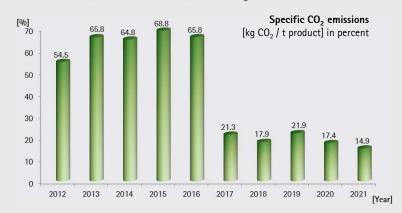
Parameter	Unit	Determined value ¹⁾	Limit value
Nitrogen dioxide [NO ₂]	mg/m³	440	500
Carbon monoxide [CO]	mg/m³	10	300
Sulfur dioxide [SO ₂]	mg/m³	1	9
Formaldehyde [CH ₂ O]	mg/m³	11	20

¹⁾The determined value presents the maximum measured value, plus an expanded measuring uncertainty, at a 100 percent capacity of the plant.

Since 2017, the site has been purchasing 100 % green electricity from renewable energies in accordance with the EnWG. Accordingly, electricity has not been included in the CO_2 balance since then.

The specific CO_2 emissions this year are 14.9 percent and have thus decreased compared to the previous year (see fig. 8).

Fig. 8: Comparison figures – Specific CO₂ emissions





Direct emissions

It is our goal, when planning new plants and buying machinery, to give serious consideration to waste air and indirect energy-consumption related CO_2 emissions. If it is not possible to avoid emissions of waste air through the production process, appropriate measures will be taken to reduce them in order to keep environmental pollution as low as possible.

Due to their gas consumption, the permanently installed plants (CHP, powder furnaces and heating boilers) cause direct emissions on site. As a result of the higher capacity utilisation of the production areas, the direct absolute CO_2 emissions have increased in the previous years (see table 15).

Table 15: Direct CO_2 emissions throuth gas und refrigerants consumption on site (CHP, powder furnaces, heating boilers, cooling systems and LPG)

	CO ₂ emissions	
	Change compared to previous year [%]	Change compared to 2019 [%]
CO ₂ [%]	+1.7	- 16.6

In addition other emissions come from the vehicles used on the site. These include cars that are mainly used by the field representatives as well as vehicles used for special purposes. The vehicle fleet was increased by 9 vehicles last year.

The average consumption of the vehicles slightly decreased to 6.6 I/100 km. The annual mileage amounted to 3.35 million kilometres. This corresponds to about 83 times round the earth or 8.7 times the distance to the moon, which we drive at the request of customers and underlines our efforts to focus even more on maintaining proximity to our customers.

The stackers mentioned have gas combustion engines (LPG) and support the battery electric-operated fork lift trucks used for in-plant transportation. After the factory structure planning in plant A and B, four gas-operated stackers are still operated in the outdoor area by the logistics team. The two other stackers are used by the maintenance department.

The railway is also used for business trips. Due to the pandemic, business trips were greatly reduced. Online solutions were set up and used instead. Compared to the previous year, personal rail kilometres were reduced by approximately 38 percent.

Table 16: Vehicle fleet 2021 mileage/consumption

Vehicles	Mileage/consumption	
145 cars (Diesel)	3,349,425 km/a	
6 stackers (LPG)	10,880 l/a	

Table 17: Average consumption vehicle fleet 2021

	Average consumption [I/100km]	
Period	2021	
car (Diesel)	6.61	

Table 18: Business trips railway 2021

	Annual kilometres train		
Period	2021	Development compared to previous year [%]	
Passenger kilometres	63,471	- 38.4	

Indirekte Emissionen

Indirect emissions include for example dispatch to Hettich overseas subsidiaries. The containers used for this are transported by rail, road or water to the seaport, from where the actual sea transport begins.

Even in the areas of indirect emissions it is constantly tried to improve the environmental performance. For example, an optimization test is currently being carried out in the logistics area to determine the extent to which direct transport to the customer is possible without intermediate storage in an external warehouse. The use of an electric tractor for internal transport is also being tested.

Furthermore, energy-efficient components are also used in the special machines that HMT manufactures for assembling furniture fittings, compressed air is dispensed with as far as possible for sorting components, and the machine lighting is switched off when the system is running in automatic mode. This reduces indirect CO_2 emissions in the downstream value chain.

Noise emissions

The company in Kirchlengern / Bünde is located in an industrial area. There are small residential areas and commercial operations in the vicinity. Measurements are carried out to maintain the limit values of the "TA noise". The adherence to the legal limit values has been assessed to ensure that the impact on the residents is as low as possible. The limit values can be reliably maintained by us throughout the year.

There is a high noise pollution when the production areas are operating. These areas are appropriately marked by us. In-house noise abatement measures, such as encapsulation, have already been introduced in existing plants. Noise reduction measures will be taken into consideration when planning new plants in accordance with the EC "Noise" Directive (2003/10/EG). Furthermore personal protective equipment has been made available. Since 2008 the employees can, on request, also have personally adapted earplugs (orthoplast) made. A noise level register has been created and controls are made regularly in all areas and corresponding measures are introduced.

Mobility Management

The often great physical distance to our customers as well as to major projects requires our company vehicle fleet. The Hettich Mobility Team has set itself the task of using the vehicle fleet more effectively and environmentally friendly in the future through redesign and – where appropriate – electrification. The first tests on the topic of e-mobility in the vehicle pool were carried out as early as 2015, and additional participation in a scientific study led to further tasks after the data were evaluated: The next step was to install a paperless, digital Car-Sharing system to manage the pool vehicles.

Currently, there are 5 electric vehicles in the vehicle pool, as well as 14 electric vehicles and 12 hybrid vehicles as company vehicles. Furthermore, an e-scooter is used for internal plant traffic at Kirchlengern site.

In addition to the use of electric vehicles including home charging solutions for company car users and the establishment of an electric charging infrastructure, the Hettich Company Car Directive was also revised in 2019 with regard to CO_2 emissions and drive technology, thus creating further incentives for more climate–friendly mobility behaviour: The mobility budget now offers the possibility to use the unspent budget for other offers, such as bicycle leasing.



5 Other factors of the Environmental Performance

4.6 Soil and ground water

No soil contamination is to be expected on the premises at Kirchlengern/Bünde because of its previous agricultural use. However precautionary soil analyses were undertaken because degreasing baths using chlorinated hydrocarbon (CKW) were used when the operation was originally started. These indicated soil contamination in the vicinity of A3. In coordination with the responsible authority, several measurements were then carried out and observed for several years. According to expert analysis, remediation was not necessary.

To confirm these results, in the following years control

To confirm these results, in the following years control samples were taken and evaluated by external testing laboratories. These investigations also confirmed that the limit values were not exceeded.

In order to prevent contamination of ground and ground water, preventive measures have been taken, e.g. acquisition of additional collecting zones. Employees working on the machines on site have also been trained to deal with water-polluting substances.

To counteract the soil sealing, the roof of the Hettich Forum was constructed as green roof. The green roof protects the roof insulation against extreme temperatures, hail and other climatic conditions and thus extends its service life. By means of roof greening the sewer system is relieved especially during heavy rainfall, as the green roof saves and evaporates – depending on construction and vegetation – 40 up to 99 percent of the annual rainfall.

Thus roof greening efficiently contributes to the cooling of buildings, air humidification and filtering of fine particles. The area of 1,643 m² in total utilised this way is considered in the same way as the near-natural area (see table 19).

Table 19: Surface areas 2021 [m²]

	Floor space [m ²]	
Period	2021	
Sealed area	213,549	
Unsealed area	126,906	
Near-natural area	1,643	
Total floor space	342,098	

5.0 Other factors of the environmental performance

Approvals

All available approvals are listed in an approval cadastre. This filterable overview includes but is not limited to approval and expiration data and collateral clauses.

Compliance with the legislation is regularly controlled by commissioned specialist functions as well as internal and external audits.

Furthermore, the status of legal compliance is reported in a standardised procedure to the management in the committee meetings for environment and safety matters. Should, in addition to this, any statutory violation be recognized the management would be informed at once in order to take measures to restore legal conformity.

Legal norms cadastre

A legal norms cadastre lists all legal requirements currently valid within the scope of environmental protection and occupational safety on the site Kirchlengern / Bünde. An external service provider regularly gives information about all modifications in the respective laws, regulations and directives which subsequently are evaluated by us in regard to possible needs for action. The evaluated modifications in the legal requirements are then forwarded to the persons responsible for processing. The implementation is ensued by means of a tracing list. The following main areas of law come into play at the site:

- Chemicals Act
- Dangerous goods legislation
- Recycling law
- Energy Law

6 Company Contact Person

Further information:

For further information please visit our homepage <u>www.hettich.com</u>.

Addresses for enquiries:

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Hettich Holding GmbH & Co. oHG, Environmental Management, Vahrenkampstraße 12 – 16, 32278 Kirchlengern



7 Name of the Authorised Environmental Advisor

At the instigation of the ESC GmbH Zertifizierungsstelle Kassel,

Teichstr. 14, 34130 Kassel:

Dr. Ralf Rieken (Licence no.: DE-V-0034)

Dr. Burkhard Kühnemann (Licence no.: DE-V-0103)



8 Validity of the Environmental Impact Statement

The undersigned, Dr. Ralf Rieken, EMAS environmental auditor with the registration number DE-V-0034, accredited for the area 25 and 28 (NACE code) and Dr. Burkhard Kühnemann with the registration number DE-V-0103, accredited for the area 46,7, 52 and 70 (NACE code) confirm that they have examined whether the location or the whole organisation as shown in the updated environmental statement for the Hettich organisation, registration number DE-108-00037, has fulfilled all the requirements of Regulation (EC) No. 1221/2009 of the European parliament and Council dated 25 November 2009 on the voluntary participation by organisations in a community system for environmental management and environmental management and audit scheme (EMAS) and Regulation (EU) 2017/1505 of 28 August 2017 and Regulation (EU) 2018/2026 of 19 December 2018.

By signing this statement, it is confirmed that

- the verification and validation has been carried out in full compliance with the requirements of Regulation (EC) No. 1221/2009, Regulation (EU) 2017/1505 of 28 August 2017 and Regulation (EU) 2018/2026 of 19 December 2018,
- the result of the verification and validation confirmed that no evidence of noncompliance with the applicable environmental regulations exists,
- the data and information of the updated environmental statement of the location provides a reliable, credible and fair view of all activities of the location within the areas specified in the environmental statement.

This statement cannot be equated with an EMAS registration. The EMAS registration can only be carried out by a competent authority under Regulation (EC) no. 1221/2009, Regulation (EU) 2017/1505 of 28 August 2017 and Regulation (EU) 2018/2026 of 19 December 2018. This statement may not be used as a stand-alone basis for informing the public.

Dr. Burkhard Kühnemann

This environmental statement for 2021 is hereby declared valid.

Kirchlengern/Bünde, July 8th 2022

Dr. Ralf Rieken (Licence no.: DE-V-0034)

(Licence no.: DE-V-0103)

VERIFIED **ENVIRONMENTAL MANAGEMENT**

DE-108-00037

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