

ALLTUB CENTRAL EUROPE 2024 sustainability report





31st MAY 2025











ESRS 2 General Disclosures

umber of sclosure	Name of disclosure	Name of chapter	Link / Page
BP-1	General basis for preparation of the sustainability statements	About the report	<u>pg 7</u>
BP-2	Disclosures in relation to specific circumstances sustainability statements	About the report	pg 7
GOV-1	The role of the administrative, management and supervisory bodies	Introductory Information / Corporate Governance of Sustainability	pg 8
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Introductory Information / Corporate Governance of Sustainability	pg 8
GOV-3	Integration of sustainability-related performance in incentive schemes	Introductory Information / Corporate Governance of Sustainability / Climate related incentive scheme	<u>pg 9</u>
GOV-4	Statement on sustainability due diligence	ESG DD data availability TBC	n/a
GOV-5	Risk management and internal controls over sustainability reporting	Introductory Information / Corporate Governance of Sustainability / Risks to the reporting proces	pg 9
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SBM-1	Market position, strategy, business model(s) and value chain	Introductory Information / Value chain	pg 11
2DIVI-T		Introductory Information / Market position	pg 12
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SBM-2	Interests and views of stakeholders	Governance / Business Conduct / Corporate Culture and Business Conduct Policies / Human Rights	pg 14
SBM-3	Material impacts, risks and opportunities and th <mark>eir interaction with str</mark> ategy and business model(s)	Introductory Information / Impacts, Risks, and Opportunities / Stakeholder involvement / Stakeholder dialogue	pg 15-16
		Introductory Information / Impacts, Risks, and Opportunities / Stakeholder involvement	pg 13
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Introductory Information / Impacts, Risks, and Opportunities / Risk management system Social / Own Workforce / Risks and Impacts Assessment Social / Workers in the Value Chain / Risks and Impacts Assessment Social / Consumers and End-Users / Risks and Impacts Assessment	pg 15-16-17
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	Introductory Information / Impacts, Risks, and Opportunities / Stakeholder involvement / Stakeholder dialogue	pg 16

○ E1 Climate change

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Risks and Impacts Assessment	pg 18
	Transition plan for climate change mitigation	Environmental Mission Statement	pg 19
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E1-4	Targets related to climate change mitigation and adaptation	Environment / Climate Change / Policy and Ambitions / Targets	pg 19
E1-5	Energy consumption and mix	Environment / Climate Change / Data and Specific Disclosures	pg 19
E1-6	Gross Scopes 1, 2 and Total GHG emissions	Environment / Climate Change / Data and Specific Disclosures / Gross Scopes 1, 2, 3, and total GHG emissions	pg 18
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Environment / Cli <mark>mate Change</mark> / Policy and Ambitio <mark>ns / Target</mark> s	<u>n/a</u>
E1-8	Internal carbon pricing	Internal carbon pricing	<u>n/a</u>
E1-9	Anticipated financial effects from material physical and transition risks and potential climate related opportunities	Financial effects	n/a

© E2 Pollution

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	Pollution / Risks and impacts assessment	pg 20
E2-1	Policies related to pollution	Pollution / Policy and Ambitions	pg 6
E2-2	Actions and resources related to pollution	Pollution / Activities	<u>n/a</u>
E2-3	Targets related to pollution	Pollution / Policy and Ambitions	<u>n/a</u>
E2-4	Pollution of air, water, and soil	Pollution / Data and Specific Disclosures, Water - Data and Specific Disclosures	pg 20
E2-5	Substances of concern and substances of very high concern	Substances of very high concern	<u>n/a</u>
E2-6	Anticipated financial effects from pollution related impacts, risks and opportunities		n/a

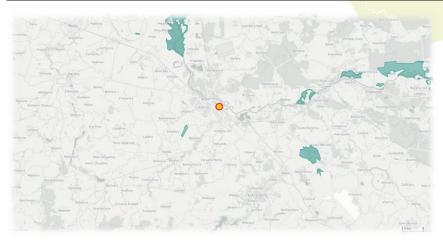
© E3 Water and marine resources

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	Water / Risks and impacts assessment	pg 20
E3-1		Water / Policy and Ambitions	<u>pg 6</u>
E3-2	Actions and resources related to water and marine resources	Water / Activities	<u>n/a</u>
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E3-4	Water consumption	Water / Data and Specific Disclosures, Water - Data and Specific Disclosures	<u>n/a</u>

E4 Biodiversity and ecosystems

Czechia | Biodiversity Information System for Europe

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
SBM	Material Impacts, risks and opportunities and their interaction with strategy and business model	Management of associated IROs	pg 20
IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities.		pg 15-16
E4-2	Policies related to biodiversity and ecosystems	Policies	pg 6
E4-3	Actions and resources related to biodiversity and ecosystems	Biodiversity and ecosystems strategy and management of associated IROs	<u>n/a</u>
E4-4	Targets related to biodiversity <mark>and</mark> ecosystems	Biodiversity and ecosystems strategy and management of associated IROs	<u>n/a</u>
E4-5	Impact metrics related to biodiversity and ecosystems change	Biodiversity and ecosystems strategy and management of associated IROs	<u>n/a</u>
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	N/A	<u>n/a</u>



$\, \odot \,$ E5 Resource use and the circular economy

Number of disclos	ure Name of disclosure	Name of chapter	Link / Page
IRO-1	Description of the processes identify and assess material or related impacts, risks and opportunities	to climate- Description of the process to identify material issues	pg 15-16
E5-1	Policies related to resource u circular economy	use and Policies related to the circular economy	pg 6
E5-2	Actions and resources related resource use and circular eco	:Waste management and KPI	pg 21
E5-3	Targets related to resource u circular economy	ise and Waste management and KPI	pg 21
E5-4	Resource inflows	N/A	<u>n/a</u>
E5-5	Resource outflows	Waste management and KPI	pg 21
E5-6	Anticipated financial effects resource use and circular eccrelated impacts, risks and opportunities	A CIT I.	<u>n/a</u>

S1 Own Workforce

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
ESRS 2 SBM	Interests and views of stakeholders	Dialogue with our stakeholders	pg 15-16
ESRS 2 SBM	Material impacts, risks and opportunities and their interaction with strategy and business model	Material IROs in terms of own workforce	pg 15-16
S1-1	Policies related to own workforce	Social and HR policy	pg 6
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Social and HR policy	pg 6
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	Speak Up channels and protection against discrimination	<u>pg 6</u>
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Social and HR policy and CoC	pg 6
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Social and HR and CoC KPIs and data	pg 23
S1-6	Characteristics of the undertaking's employees	Social and HR and CoC KPIs and data	<u>pg 23</u>
S1-7	Characteristics of non-employees in the undertaking's own workforce	Social and HR and CoC KPIs and data	pg 23
S1-8	Collective bargaining coverage and social dialogue	Social and HR and CoC KPIs and data	pg 23
S1-9	Diversity metrics	Social and Safety KPIs	pg 23
S1-10	Adequate wages	Social and HR policy and CoC	pg 23
S1-11	Social protection	Social and HR policy and CoC	pg 23
S1-12	Persons with disabilities	Social and HR policy and CoC	pg 23
S1-13	Training and skills development metrics	Social and HR policy and CoC	pg 23
S1-14	Health and safety metrics	Social and HR policy and CoC	pg 23
S1-15	Work-life balance metrics	N/A	<u>n/a</u>
S1-16	Remuneration metrics (pay gap and total remuneration)	Social and Safety KPIs	pg 23
S1-17	Incidents, complaints and severe human rights impacts	Social and Safety KPIs	<u>n/a</u>

S2 Workers in the value chain

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
SBM-2	ESRS 2 SBM-2: Interests and views of stakeholders	Dialogue with our stakeholders Stakeholders materiality	pg 15-16
S2-1	Policies related to value chain workers	Policies related to value chain workers	pg 6
S2-2	Processes for engaging with value chain workers about impacts	Social and HR policy and CoC	pg 6
52-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns 3	Speak-Up Helpline (Whistleblowing)	<u>pg 6</u>
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	IRO Specific - Policy, Actions, Targets	pg 6
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	IRO Specific - Policy, Actions, Targets	pg 23

S3 Affected communities

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
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S4 Consumers and end-users

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- 9	Material impacts, risks	and	Dialogue with our stakeholders	
SBM	opportunities and their	interaction	Dialogue with our stakeholders Stakeholders materiality	pg 15-16
	with strategy and busin	ess model	Stakeholders materiality	

G1 Governance

Number of disclosure	Name of disclosure	Name of chapter	Link / Page
SBM	Material impacts, risks and opportunities and their interaction with strategy and business model	Dialogue with our stakeholders Stakeholders materiality	pg 15-16
G1	Corporate sustainability annual report	Corporate sustainability annual report	pg 8

Policies and Code of Conduct

Scocial and governance aspects and policy of ALLTUB CENTRAL EUROPE are based on ALLTUB GROUP policies and these are described in HR and Social policy, related procedures as well as ethics and also Code of Conduct and shared via suppliers Code of Conduct procedure.

- Basic rules and KPIs
- 8 pages

△ ALLTUB	ALLTUB GROUP PROCEDURE	Prepared by: M.Stacina
	SOCIAL and Human Resources policy	Pages: 1/8
Version: 01	AGP 2024 07 01	Date: 1st July 2024

1. Preamble

ALITUB GROUP sees the company's employees as an essential resource for its proper operation. Employees satisfaction as well as health and safety were identified in ALITUB's materiality matrix as important. To demonstrate its commitment to Human Resources, Alitub Group has defined the values that promote the importance of Human resources in this Policy. The ALITUB GROUP is committed to respecting fundamental human rights.

Alltub Group has also appointed Human Resources Directors in each business unit as responsible for the definition, implementation, communication, and continuous improvement of its Social Policy.

2. Range

This policy applies to the whole ALLTUB GROUP with the plants in France, Italy, Germany, Czech Republic and Mexico. It concerns all of 1272 employees present on January 1, 2024, as well as any new arrivals, on permanent or fixed-term contracts, temporary workers and subcontractors working occasionally on our sites.

3. Our Commitments

As part of its ongoing efforts, Alltub Group is focusing on the following initiatives:

- 1. Employee health and safety
- Working conditions
 Social dialogue
- 4. Career development and training
- Diversity, equality, and inclusion
 Child labour, forced labour & human trafficking

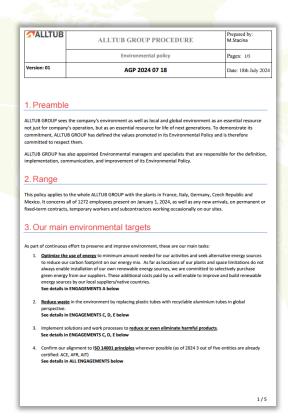
Employee health and safety

Commitment: At Alltub Group, we are convinced that the health and safety of our employees are paramount. We are committed to provide a safe and healthy working environment for all our employees placing health and safety at the heart of all our decisions and projects.

As part of prevention actions, each of the Alltub business units has established and reviews its Risk Assessment Document at least once a year. This document lists all the physical and psychological risks present on the respective site; it makes it possible to define and prioritize action plans to eradicate these risks. **✓** Environmental policy

Basic rules and KPIs

5 pages



Code of Conduct & procedure

Basic rules internal

0 10 pages

Supplier CoC & procedure

Basic rules towards S/Chain

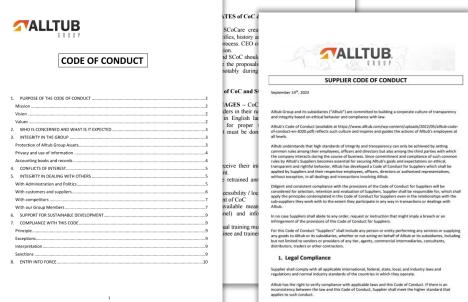
O 4 pages

ALLTUB GROUP
PROCEDURE
PROCEDURE

ESG - Code of Conduct procedure
Pages: 1/2
Version: 01
AGP 2024 01 31
Date: 31st Jan 2024

1. SCOPE

Code of Conduct (CoC) is essential set of principles and guidance for each and every ALLTUB employee and is available for other external stakeholders, most notably suppliers. Supplier Code of Conduct (SCOC) is a derivator of ALLTUB GROUP CoC and compliance to SCoC is mandatory for long-term partnership for ALLTUB's suppliers.



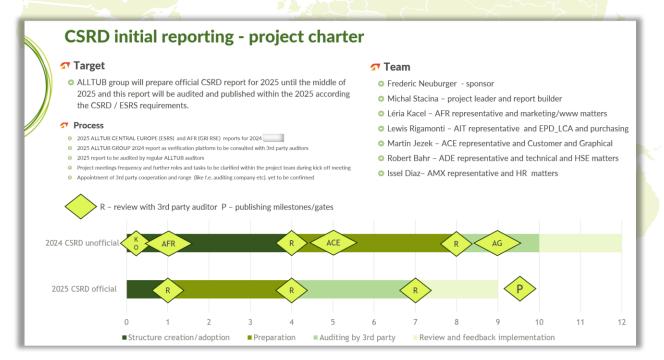
Note: GHG emissions calculated with european countries EF correct to specific years as of AIB.

Emission factor for Mexico is 431 gCO2/kWh for 2022-2026 (same as 2020) as far as last published (www.climate-transparency.org) 300gCO2/kWh was for 2021, however previous worse case (2020) was applied for following years calculations due to unpredictable development. No further energy saving programms were included yet, however individual savings activities are ongoing in our plants



About this report

- The Sustainability report is being prepared in allignment with ALLTUB CENTRAL EUROPE's and ALLTUB GROUP Environmental and Social and HR policies.
- The assessment of the report, materiality analysis and impact, risks and poortunities analysis is based on CSRD and ESRS standards and bearing in mind recent voluntary VSME format due to CSRD Omnibus STOP THE CLOCK Situation.
- The reported areas allign with materiality analysis conducted in 07-09 2023 with internal as well as external stakeholders of ALLTUB CENTRAL EUROPE as well as ALLTUB GROUP and reviewed and updated 21.10.2024
- © The report was assembled using individual Business Unit's data (ALLTUB CENTRAL EUROPE) by wider ALLTUB GROUP ESG CSRD Team



Corporate Governance of Sustainability

- © The ALLTUB CENTRAL EUROPE and ALLTUB GROUP sustainability governance covers all production as well as other support organisations.
- The sustainability steering committee consists of CEO, COO, CCO, M&A Director, Purchasing Director and ESG manager and meets at least twice a year to set and update sustainability strategy, set define specific sustainability activities and set corresponding targets.
- © The sustainability matters are regularly shared with the board of directors at least quarterly
- © Once a year, the COMPLIANCE REPORT is shared with the board of directors summarizing status and progress of sustainability matters as well as the action plan related to ESG matters











Corporate Governance of Sustainability - organisation

- Supervisory board (GROUP related)
 - O Total number of members: 5
 - Women: 0
 - Men: 5
 - ◎ % of independent: 40% (2 out of 5)
- ALLTUB GROUP MANAGEMENT (incl. ESG manager and Purchasing Director)
 - Total number of members: 6 (CEO,CFO,CCO,CBD,PD,ESG)
 - Women: 0
 - Men: 5
 - © % of independent: 17% (1 out of 6)
- Sustainability related incentive programme description
 - Executive performance targets are a combination of objectives with focus on value creation and specific key projects (determined on an annual basis) and company's

- ALLTUB CENTRAL EUROPE management
 - Total number of members: 8
 - O Women: 2



Men: 6

- ALLTUB CENTRAL EUROPE verall
 - Total number of employees: 312
 - Women: 126



Men: 186



Company profile

OUR VALUES

OUR MISSION

ALLTUB is a pure aluminium packaging specialist, worldwide leader in collapsible tubes and a key player laminate tubes, aerosol cans and cartridges. We provide solutions for our customers in the pharmaceutical, cosmetic, food and industrial markets.

OUR VISION

ALLTUB wants to be the best partner in providing added value in pure aluminium packaging solutions both globally and locally, by relying on high quality standards and passionate employees.

SUSTAINABILITY

© For many years, ALLTUB has been committed to being socially responsible regarding its industrial activities in terms of sustainability (reduction of greenhouse gas emission, waste sorting, recycling...), improvement of its product quality, social inclusion and economic development. The Group is committed to respecting various social, environmental and economic criteria and our commitments are visible in our HR and Social policy as well as EMS policy. At LTUB has been regularly assessed by Ecovadis, CDP, European, Malk as well as individual plants are assessed by Circularity (AIT) and similar programmes.

Values

- Respect
- Continuous improvement
- Walk the talk and be consistent
- O Discipline
- Team-work
- Trust

O History

ALLTUB: though a relatively new name in the packaging market, Alltub has many decades of experience in this industrial market dating back to its original roots as part of the Pechiney, Cebal and Alcan organisations. Throughout its history and evolution, ALLTUB has doubled in size since its creation in 2005.

O Production plants

- With six production plants located around the world (France, Germany, Italy, Czech Republic, Mexico), ALLTUB has more than 75 production lines manufacturing over 1.6 billion units per year (aluminium tubes, laminate tubes, aluminium cartridges and aluminium aerosol cans). ALLTUB employs 1400 people worldwide and generates over €150 million of sales per year.
- All Alltub plants are certified ISO 9001 with additional certifications such as ISO 14001, ISO 15378, ISO 50000 and ISO 22000.



Value Chain

◎ The completeness of ALLTUB's value chain has been audited audited by EPD declaration that includes business units of ALLTUB GROUP.

	R&D	Supply chain	Production	Logistics	After sales	Recycling
Commitments	Strong focus on development of easily recyclable products as well as products from PCR and PIR materials	Supply chain is involved in ALLTUB's sustainability focus that is formalized by ALLTUB's Supplier Code of Conduct and sell practiced during supplier selection and evaluation.	Modernisation and efficiency, waste and scrap reduction management. Reduction of hazardous substances.	Minimalisation of transport cost by combining of several batches ordering and storage. Reusable pallets and packaging where possible.	highly recyclable, however we coooperate with customers to clearly define the recyclability class for clear information towards their customers (end	As far as aluminium is ideal material for recycling, it is our material of choice.
Examples	Green Tube high amount of PCR and PIR recycled materials	SCoC complying suppliers, Selection and Evaluation of suppliers considering ESG principles.	completely new line in AIT for aluminium production in and in ADE for laminate production. T65 Operations Excellence team setup.	Transportaion of several batches and slug diameters of Aluminium tubes within one delivery. Transport inserts to avoid contamination of barrels for repeated use.	analysis of our aluminium tube - seafood tube in diameter 35mm	Aluminium scrap return to suppliers for recycling. Recycling of our product recycling is imminent.

Market position

ALLTUB offers many technical solutions dedicated to various markets specialized in pharmaceuticals, cosmetics, foods and industrial packaging. Over the years, ALLTUB has developed true expertise and has provided many customers specialized in various sectors with high-quality, fast-changing products.

O PHARMACEUTICAL TUBES MARKET:

- ALLTUB is the world's largest producer of tubes for the pharmaceutical industry with more than 500 million tubes produced each year, representing more than 30% of our entire production. Three of ALLTUB's plants are certified ISO 15378 and with ISO 8 cleanroom production being offered. Several ALLTUB plants have a DMF (Drug Master File) with the US FDA (Food and Drug Administration) and with Health Canada.
- Producing tubes while respecting Good Manufacturing Practices (GMP) is part of ALLTUB's daily work. In that respect, ALLTUB also provides back-up and production support solutions unrivalled in the marketplace. This is why major global pharmaceutical laboratories have placed their trust in ALLTUB aluminium and laminate tube packaging for so long.

O COSMETIC TUBES MARKET:

The cosmetics market represents an important and strategic market for the ALLTUB Group. In particular this market includes hair dye, skin cream, hand cleansing gel and deodorant products. ALLTUB is a trusted supplier recognised for many years by large multinational groups in the beauty industry as well as numerous local clients.

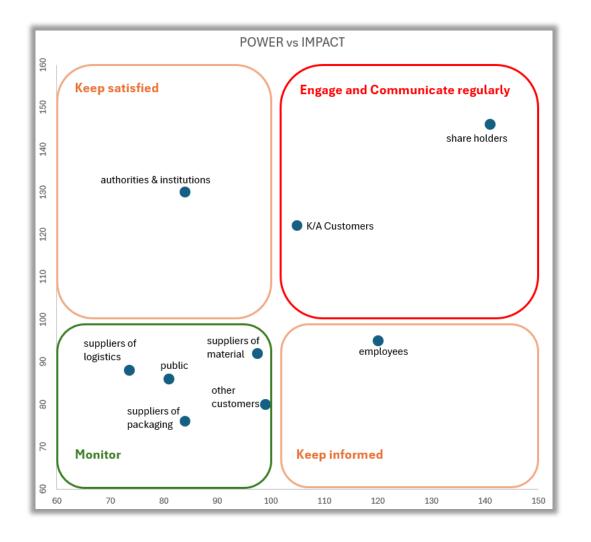
O ALUMINIUM FOOD TUBE MARKET:

ALLTUB is Europe's leading producer of aluminium tubes for the food industry, supplying more than 200 million tubes per year for this market. Many mass-consumption products are packed in aluminium tubes such as tomato purée, tomato concentrate, mustard, mayonnaise, meat pâté, fish pâté and other high-quality foods. Many famous name food brands have trusted ALLTUB for many years.

O INDUSTRIAL TUBE and CARTRIDGE MARKET

- ALLTUB Group is one of the leading global producers of aluminium cartridges. In addition, ALLTUB also supplies specific aluminium tubes to some industrial, strategically powerful markets such as the super glue market for which tubes must be completely airtight.
- With a global, annual production of more than 150 million units, tubes and cartridges used for industrial applications fit nicely within the ALLTUB product portfolio.

Interests and views of stakeholders



STAKEHOLDERS QUESTIONNAIRE

- © 24 out of 34 reponses throughout ESG community of ALLTUB
- © 2 questionnaires conducted in order to receive correct data

Severity (based on 1,3,5,7 scale)	(our) IMPACT	(their) POWE
Key-Account Customers	105	122
Other Customers	99	80
employees	120	95
Shareholder/investor/board members	141	146
Suppliers of logistics and services	73,5	88
Suppliers of material and components	97,5	92
Suppliers of packaging	84	76
	81	86
Public	84	130
Other stakeholders (authorities, institution)		

- © Share holders & Key accounts regular and active reporting and involvement (MALK, PARTNERS GROUP etc.)
- Authorities and institutions esp. HR, H&S, audit AP's fulfilment, IPPC reports/BAT
- Employees involvement esp. regular meetings incl. ESG information, magazines, boards
- Other suppliers policy sharing, auditing



Human rights and governance

- Alltub group places the highest value on the integrity of the Group and each of its subsidiaries' or affiliated companies' ("Alltub Group", "Alltub" or the "Group") employees, officers or directors (together the "Group Members"). The rules and policies in this code (the "Code" or the "Code of Conduct") apply in all businesses and all countries in which the Group operates.
- Alltub Group acknowledges that each country where it operates has its own laws, regulations and practices that shall be complied with. Therefore, this Code of Conduct will only go into effect insofar as it is compatible with local law. It is the responsibility of each and every one to observe the provisions in force in each country.
- © In addition to the international conventions, law as the FCPA Act in the USA, or the UK bribery acc, internal rules and ethical standards, our conduct is derived from Group Mission, Vision and Values.

© Mission

The mission of Alltub Group is an aluminium packaging specialist, worldwide leader in aluminium collapsible tubes, with a niche in laminate tubes and a key player in aerosol cans and cartridges.

We provide solutions for our customers in the pharmaceutical, cosmetic, food and industrial markets.

Vision

Alltub Group wants to be the best partner in providing added value in aluminium based packaging solutions both globally and locally, by relying on high quality standards and passionate Group Members.

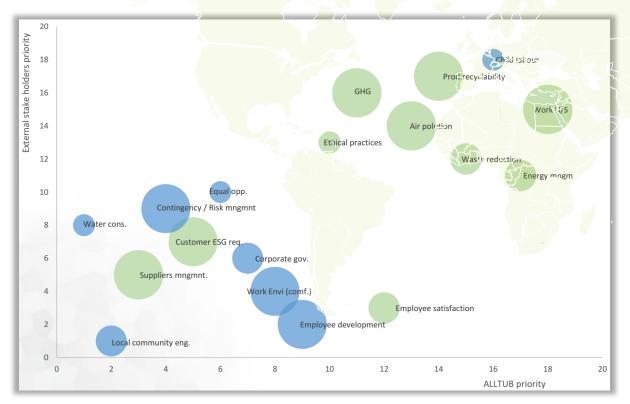
Values

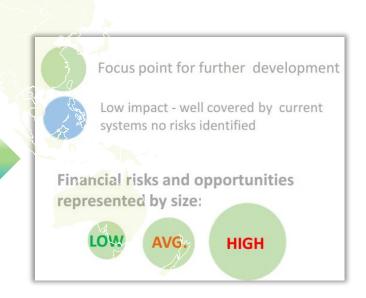
"Respect, Trust, Discipline, Continuous improvement, Teamwork, Walk the talk and be consistent "

- Our business is built on quality products, competitive prices and quality service. Alltub is also world leader in its market and require trust of all stakeholders. Because the success is so closely related to the reputation, it is up to all Group Members concerned of Alltub to protect that reputation.
- Alltub Group provides the Code of Conduct to its Group Members for their guidance in recognizing and resolving properly the ethical and legal issues they may encounter in conducting the Group's business. Our values make us act with integrity avoiding legal issues. This means acting honestly and treating each other and our customers, partners and suppliers fairly, and with dignity.

Materiality common for all ALLTUB units incl. ALLTUB CENTRAL EUROPE

- Materiality analysis organized by ALLTUB ESG manager is based on:
 - Internal questionnaire
 - Internal questionnaire on behalf of external stake holders reporting on behalf of our external stakeholders was offered to all internal responders. Half of internal respondents opted to report also on behalf of internal representatives, presumably those from internal departments that are frequently in touch with suppliers, customers and local authorities. (14 responses/ out of 30 called-up)
 - © External Stake Holders questionnaire (13 customer contacts/13 companies, 23 supplier contacts/15 companies and 6 individuals (shareholders, investors, authorities))
- After review of raw data from internal and external questionaires and further individual interviews with 30 internal employees (ESG community) there was the IN/OUT analysis done during the strategy call on 27th
 July 2023 where additional modifications were done in order to include Employee satisfaction, Supplier management and Customer requirements into the scope of ALLTUB GROUP materiality. Materiality matrix was reviewed as part of ESG Due Diiligence process in October 2024









ALLTUB ESG materiality assesment

ALLTUB employees - please fill in the first part (internal) of the questionaire as mandatory (all points)!

Please feel free to fill in the second part (external point of view) on behalf of external stakeholders only if you feel that you understand external requirements well (suppliers, customers, authorities etc.). The second part of questionaire will be seperately submitted to chosen external stakeholders later on.

ALLTUB INTERNAL POINT OF VIEW
 (ALLTUB business unit and/or ALLTUB GROUP)

	Not important at all	Not very important	Important	Very Important	Extremely important
Work health and safety	0	0	0	0	\circ
Air polution	\circ	\circ	\circ	0	\circ
Waste reduction	0	0	0	0	\circ
Water consumption	\circ	\circ	\circ	\circ	\circ
Energy management	0	0	0	0	0
Suppliers ESG cooperation	\circ	\circ	\circ	\circ	\circ
Customer ESG requirements	0	0	\circ	0	\circ
Ethical business practices	\circ	\circ	\circ	\circ	\circ
Product recyclability	0	0	0	0	0
Equal opportunities and diversity	\circ	0	\circ	0	\circ
Child labour	0	0	0	0	\circ
Work Environment (comfort)	0	\circ	\circ	\circ	\circ
Employee development	0	0	0	0	\circ
Employee satisfaction	\circ	\circ	\circ	\circ	\circ
Greenhouse gas reduction	0	0	0	0	\circ
Contigency planning / risk mngmnt	0	0	0	0	\circ
Local Community engagement	0	0	0	0	0
Corporate governance	0	0	0	0	0

- Two parts questionnaire was sent out and received throughout August 2023:
 - Internal stakeholders questionnaire
 - Internal POV (26 responses / out of 30 requested) 86% return rate
 - © External stakeholders POV (14 responses / out of 30 requested) 46% return rate
 - © External questionnaire (16 responses / out of 42 requested) 38% return rate

2. EXTERNAL POINT OF VIEW
(customers, suppliers, authorities, city hall, public, neighbours, EU administration etc.)

	Not important at all	Not very important	Important	Very Important	Extremely important
Work health and safety	0	0	0	0	0
Air polution	0	0	0	0	0
Waste reduction	0	0	\circ	0	0
Water consumption	\circ	\circ	\circ	\circ	\circ
Energy management	\circ	0	\circ	\circ	0
Suppliers ESG cooperation	\circ	\circ	\circ	\circ	\circ
Customers ESG requirements	\circ	0	0	\circ	0
Ethical business practices	\circ	\circ	\circ	\circ	0
Product recyclability	\circ	0	\circ	\circ	\circ
Equal opportunities	\circ	\circ	\circ	\circ	0
Child labour	0	0	\circ	0	0
Work Environment (comfort)	\circ	\circ	\circ	\circ	\circ
Employee development	0	0	0	0	0
Employee satisfaction	\circ	\circ	\circ	\circ	\circ
Greenhouse gas reduction	0	0	0	0	0
Contigency planning / risk mngmnt	0	0	0	0	0
Local Community engagement	0	0	0	0	0
Corporate governance	0	\circ	\circ	\circ	\circ

Risk management and Company Governance

- © Company SWOT analysis and risk and opportunities evaluation is being performed on business unit level during annual management review within the scope of existing management systems as well as on the group level during annual strategy meetings with participation of all usiness units.
- The group level SWOT analysis is done in a team joint approach and for highest risks and opportunities there is a dedicated task force team assigned.
- One of examples of such RISK and OPPORTUNITIES output is a green team setup in 2021 which led to several Environmentaly positive activities (i.e. recycling materials usage lik ef.e. Green Tube etc.)

Moaknoccoc

			Weaknes	sses	SCORE
Strenghts	Draduct (f. a. vanualahilitu, vanauvana damandata)	SCORE		Diversity	9
	Product (f.e. recyclability, resources demand etc.) Enviromental management	18 15		Social responsibility matters	8
	Know-How (ESG related)	8		,	
	Organisation / Governance	δ Λ		Supply chain relations (ESG areas)	4
	Social responsibility matters	4		Organisation / Governance	4
	Supply chain relations (ESG areas)	3		Inclusion	4
	Dynamic Approach (innovations)	3		Other	3
	Conservative approach (towards ESG requirements)	2			3
	Equity	1		Too conservative approach (towards ESG requirements)	2
	Diversity	0		Know-How (ESG related)	2
	Inclusion	0		Product (f.e. recyclability, resources demand etc.)	2
				Equity	2
Opportunitie	es	SCORE		Environmental management	0
	Product improvement	3		Environmentatinanagement	· ·
	Processes improvement/investments	3	Threaths		
	Organisation improvement	3		Not optimal organisation	6
	Marketing and presentation of our ESG performance	3		Absence of green product development	2
	Supply chain cooperation and improvement	2		Poor portfolio diversification	2
	Investment into green technologies	2		Green material shortage	1
	Consumption reductions	1		Market loss due to slow ESG	1
	Improve H&S	1		Legislation and regulations	1
	·			Workers know-how loss	1
				Very outdated production equipment.	1

SCODE

Environmental Risks and Impact Assesment – ALLTUB CENTRAL EUROPE

- © Energy management was highly scored by internal materiality matrix respondents as well as GHG emissions area was highly ranked by the external stakeholders, that's why ALLTUB GROUP set a workgroup across the group to actively look for energy and green house gas emissions reduction. Apparently, energy consumption reduction is at the core of GHG reduction and there are several paths that leads to energy consumption/GHG emissions reduction.
- The first and most rewarding way considering the overall energy demanding (esp. aluminium) tubes production is definitely the production efficiency improvement. That is why there is a specific OPERATIONS EXCELLENCE work group set in 2022 lead by newly established OPERATIONS EXCELLENCE MANAGER that incl. external experts.
- Another way to reduce energy consumption is by technological improvements and reduction of waste and scrap programms introduced by individual business units. In ACE f.e. compressor exchange to more efficient type was done in 2023/2024

Specific Disclosures & Data - ACE

TOTAL Electricity MWh Non-Renewable Electricity MWh Renewable Electricity MWh Products sold Renewable Electricity %

NG consumption MWh

2021	2022	2023	2024
67027	65029	61890	61331
59246	58170	50003	38534
7781	6859	11887	22797
1495	1459	1412	1375
12%	11%	19%	37%
_			
0004			

2021	2022	2023	2024
44392	42227	41483	42875

	GHG emissions	NEGATIVE
Climate Change mitigation	GHG emissions	OPPORTUNIT
	Climate change mitigation	RISK

						Energy	Ene	rgy	RISK	DO
Scope 1					Scope 2		Ene	rgy	RISK	DO
	2021	2022	2023	2024		2021	2022	2023	2024	
ADE	1593	1671	1671	1511	ADE	4135	4907	2549	2495	
AIT	4142	4050	3931	4231	AIT	5538	5930	3278	3365	
AFR	1446	1132	1014	1050	AFR	729	1604	468	467	
ACE	990	931	1029	1101	ACE	10060	12026	10500	5221	
AMX	59	77	87	78	AMX	4471	6378	6172	5880	
AG Scope 1	8230	7861	7732	7971	AG Scope 2	24933	30845	22967	17428	
NG consumption					EE consumption					
Year	2021	2022	2023	2024	Year	2021	2022	2023	2024	
ADE	8681	9107	9078	8226	ADE	6693	7174	7035	6932	
AIT	22649	22128	21493	23139	AIT	12129	12972	13097	13444	
AFR	7843	6093	5462	5663	AFR	15011	12837	11494	11455	
ACE	5219	4899	5450	5847	ACE	18292	17249	15944	15857	
AMX	0	0	0	0	AMX	14903	14797	14320	13643	
NG cons TOTAL	44392	42227	41483	42875	EE cons TOTAL	67027	65029	61890	61331	

Matter	Sub Topic	Type of IRO	Value Chain Location	Time frame	IRO description	SCALE 1-4	SCOPE 1-4		OD (for potential impacts) 1-4		FINANCIAL IMPACT / BENEFIT 1-4	LIKELYHO OD 1-4	R/O MATERIAL >5
Climate Change adaptation	Climate Change adaptation	RISK	UPSTREAM OWN OPS DOWNSTREAM	MEDIUM TERM	Regulatory risks as well as financial risks to adopt to climate change. Specific risks to ALLTUB are indirect, related to increased prices of energy and commodities.						3	3	9
	Climate Change adaptation	RISK	OWN OPS	SHORT TERM	Increasing temperatures can affect workspace temperatures in our locations and overheating and mitigation by A/C would increase energy consumption and generation of GHG						2	2	4
	GHG emissions	IMPACT NEGATIVE	UPSTREAM OWN OPS DOWNSTREAM	SHORT TERM	ALLTUB's Scope 1,2,3 emissions are impacting climate change. Scope 1 and esp. Scope 2 emissions actively reduced, hence Scope 3 emissions are the highest (upstream product and services related Scope 3 emissions are calculated)	3	4	4	4	192			
Climate Change mitigation	GHG emissions	OPPORTUNITY	DOWNSTREAM	SHORT TERM	ALLTUB's core product - Aluminium Tubes, Cartridges and Cans produced from recycled Aluminium and green/clean energy are alternative to other packaging products produced from virgin materials that require more energy and therefore our Green Tube can mitigate Climate Change.						2	3	6
	Climate change mitigation	RISK	OWN OPS DOWNSTREAM	MEDIUM TERM	ALLTUB may face regulatory and financial risks in case of insufficient reduction of GHG.						3	2	6
	Climate change mitigation	RISK	DOWNSTREAM	SHORT TERM	ALLTUB may face marketing issues and departure of key customers in case of not fullfilling GHG reduction according existing or desired targets.						2	2	4
Energy	Energy	RISK	UPSTREAM OWN OPS DOWNSTREAM	MEDIUM TERM	Financial risks related to increased demand for renewable energy.						3	3	9
	Energy	RISK	UPSTREAM OWN OPS DOWNSTREAM	MEDIUM TERM	Worse GHG properties of NG and potential ban would make NG unavailable and would cause some of the technologies obsolete.						3	1	3
4000		/											

- Overall direct emissions in ACE are reduced Scope 1+2
- Scope 1 (NG gas related) has slightly increased to avoid efficiency loss of changeovers (more efficient startups) and overal energy consumption, however this was compensated by even higher consumption of Electric energy and...
- Scope 2 essential reduction by planned Renewable Energy Purchase

Transitional plan / GHG target (GROUP p.o.v., ALLTUB CENTRAL EUROPE on previous page)

- There are several projects identified by our business units in order to reduce energy consumption and GHG emissions. Some are linked to efficiency improvement like new high speed production lines in our plants in Italy and Germany (2022 initiatives) or technological improvements like new more efficient air compressors instalation in Czech plant (2022/2023 initiative) and energy leaks detection programe in ALLTUB FRANCE and MEXICO.
- Since 2023 we are intensively looking for the ways to improve ratio of renewable energy which has increased to 37% in 2024 in comparison to 12% in 2021 and is a key driver of Scope 2 reduction also for next years.
- Natural gas consumption is essential for Aluminium tubes production as well as electricity and usage of Natural Gas except of Electricity in certain production steps reduces energy waste as well as it is essential driver to reduce air pollution when used by incinerators. However overall negative effect of Natural Gas consumption on Global Warming drives our NG reduction initiatives just like electrification of certain machines and preference of electric vs. Natural Gas industrial ovens.

ALLTUB GROUP carbon emissions target* is to reduce Scope 1&2 emissions, i.e. ALLTUB's own emissions, by 30% by 2030**.

- Related to sales qtty
- ** Base year reference 2019

RENEWABLE ELECTRICITY CONTENT

	2019	2020	2021	2022	2023	2024	2025 EST	2026 EST
TOTAL Electricity MWh	65381	64317	67027	65029	61890	61331	61890	61890
Non-Renewable Electricity MWh	54387	49501	59246	58170	50003	38534	31011	29252
Renewable Electricity MWh	10994	14815	7781	6859	11887	22797	30879	32638
Products sold	1459	1427	1495	1459	1412	1375	1412	1412
NREE / MU	37	35	40	40	35	28	22	21
TOT EE / MU	45	45	45	45	44	45	44	44
NREE CONTENT RATIO	83%	77%	88%	89%	81%	63%	50%	47%
Renewabl <mark>e Electricity %</mark>	17 %	23%	12%	11%	19%	37%	50%	
NREE / Munits vs. 2019	100%	93%	106 %	107 %	95%	75 %	59%	56%
NREE 2026 vs 2019 reduction	0%	6,9%	-6,3%	-7,0%	5,0%	24,8%	41,1%	44,4%

GHG SCOPE 1&2 REDUCTION

	2019	2020	2021	2022	2023	2024	2025 EST	2026 EST							
Scope	e 1 8636	8134	8230	7861	7725	7975	7725	7725							
Scope	e 2 <mark>27337</mark>	25383	24933	30845,17	22967,12	17428,35	16047,07	14780,91							
Scope 1	&2 <mark> 35972,74</mark>	33516,55	33162,5	38706,17	30692,12	25403,35	23772,07	22505,91							
PRODU <mark>CTS I</mark>	1459 1459	1427	1495	1459	1412	1375	1412	1412							
Scope 1 per l	1ս	5,70007	5,505017	5,387937	5,470963	5,8	5,470963	5,470963							
Scope 2 per l	1u	17,78735	16,67726	21,141 <mark>31</mark>	16,26566	12,67517	11,36478	10,46807							
Scope 1 & 2 per Mu produc	ed <mark> 24,65575</mark>	23,48742	22,18228	26,5292 <mark>5</mark>	21,73663	18,47517	16,83575	15,93903							
Scope 1&2 / Mu vs 20	19 <mark>100%</mark>	95%	90%	108%	88%	75%	68%	65%							
GHG 2026 vs 20	19 0 %	4,7%	10,0%	-7,6%	11,8%	25,1%	31,7%	35,4%							

Note: GHG emissions calculated with european countries EF correct to specific years as of AIB.

Emission factor for Mexico is 431 gCO2/kWh for 2022-2026 (same as 2020) as far as last published (www.climate-transparency.org) 300gCO2/kWh was for 2021, however previous worse case (2020) was applied for following years calculations due to unpredictable development. No further energy saving programms were included yet, however individual savings activities are ongoing in our plants

Environmental Risks and Impact Assesment

Matter	Sub Topic	Type of IRO	Value Chain Location	Time frame	IRO description	SCALE 1-4	SCOPE 1-4	IRREMEDI ABILITY 1-4	LIKELYHOO D (for potential impacts) 1-4	IMPACT MATERIAL >100	FINANCIAL IMPACT / BENEFIT	LIKELYHOO D	R/O MATERIAL >5
Polution of Air	Polution of Air	IMPACT NEGATIVE	UPSTREAM OWN OPS DOWNSTREAM	SHORT TERM	The impact of (residual i.e. not burnt by incinerator) emissions generated by heat treatment operations (annealing (dust), curing/polymerisation of varnishes (VOC))	3	2	4	3	72			
Polution of Air	Polution of Air	IMPACT NEGATIVE	OWN OPS	SHORT TERM	The impact of fugitive emissions not collected by exhaust system and incinerators may affect workplace air quality and cause breathing difficulties.	3	2	3	3	54			
Polution of Water	Polution of Water	IMPACT NEGATIVE	UPSTREAM OWN OPS	SHORT	Discharged water for industrial usage -Water is not used for industrial purposes in most ALLTUB plants, except of plants in Italy where water is used for washing away of extruded aluminium cans. Impact of ALLTUB's water discharge may cause presence of contamination. This could affect water quality and impact aquatic life.	2	2	3	3	36			
	Polution of Water	IMPACT NEGATIVE	UPSTREAM OWN OPS	SHORT TERM	Cleaning water discharge or spills may cause presence of ground contamination. This could affect water quality and impact aquatic life.	2	2	3	3	36			
Polution of Soil	Polution of Soil	RISK	OWN OPS	MEDIUM TERM	Potential impact of previous land owners activity may result in needed assanations of previously contaminated soil in recent ALLTUB premises						2	1	2
Polution of Soil	Polution of Soil	IMPACT NEGATIVE	UPSTREAM OWN OPS DOWNSTREAM	MEDIUM TERM	The impact of ALLTUB's potential soil contamination by leaks of oils or fuel into the soil may cause pollution.	3	1	3	3.	27			
Matter	Sub Topic	Туре о	f IRO Value Chain Location	Time frame	IRO description SCA 1-		SCOPE I	RREMEDIABI LITY 1-4	LIKELYHOOD (for potentia impacts) 1-4		FINANCIAL IMPACT / BENEFIT	LIKELYHOOD	R/O MATERIAL >5

See ESRS E2 for polution and E1 for GHG related effects on Marine and Water resources – Marine and water area non material for ALLTUB CENTRAL EUROPE

Specific Disclosures & Data – ALLTUB CENTRAL EUROPE:

		2022	2022	2024						
		2022	2023	2024	Water Consumption		2022	2023	2024	
Pollutants and other substances		Data	Data	Data	Water consumed	Cubic meters	2 833	2 777,000	2 719,0	
Inorganic pollutants emissions	Tonnes	0,72	8,78	3,9100						
Air pollutants emissions	Tonnes	23,88	21,50	19,599	Water recycled or reused	Cubic meters	0	0,000	0	
Ozone-depleting substances emissions	Tonnes	0,00	0,00	0,00						

Environmental / WASTE and circular economy

Alltub won the Tube of the Year prize in 2020 for its Green Tube* innovation, made from >95% Post-Consumer Recycled aluminium, from the European Tubes Manufacturers Association and has subsequently announced "WORLDSTAR WINNER 2021" by the World Packaging Organisation (WPO) with the following motivation:

The use of PCR in no way detracts from the tube's positive properties and outstanding performance: it retains all the benefits associated with product protection and meets all other consumer requirements and expectations perfectly, regardless of the product in question. This is because the closures, internal varnishes and combinations of different printing options that are used for virgin aluminium tubes can also be used for the Green tube. A water-based transparent base lacquer was used for the Green tube prototypes to emphasise the aluminium's natural appearance. This further underlines the green orientation of the tube. A green landscape nature print complements and rounds off this design concept and, as far as the design and layout are concerned, sums up the tube's philosophy in a visually appealing manner*

The Green tube, in its various customized versions and produced in all of Alltub's business units, was launched on the market at the end of 2020 in partnership with our customers. In 2022, Alltub supplied over 125 million green tubes with a total weight of over 1,000 tonnes.

Aluminium is recognised for its exceptional qualities allowing the development of numerous applications used by consumers across the world. Aluminium tubes, aerosol cans and cartridges are a combination of cutting-edge technologies 100%... natural! Ten points to convince you:

- O Recyclable: Aluminium products can be recycled easily and require little energy to provide the material with a new lease of life. The general qualities of aluminium are long lasting.
- O Lightweight: Compared to other materials, the content-weight ratio is more favorable. A 7g tube can hold up to 100ml of product.
- O Accurate dosage: Because aluminium tubes are both flexible and airtight, end-users can easily dispense the quantity of product. The dosage is accurate, optimized with a high restitution rate and wastage is avoided.
- O Resistant: Aluminium provides a natural air-tight barrier and is corrosion-resistant while completely eliminating any air transfer and "suck-back" effects. Aluminium barrier properties protect the entire packaging from any external, harmful element.
- O Adapted: Unlike other packaging, aluminum packaging can contain products with strong active ingredients. They are also perfectly adapted to any other type of application with milder ingredients.
- O Abundant: Bauxite, the raw material required to produce aluminium and is the third most abundant resource on earth in almost unlimited quantities
- O Aesthetic and rewarding: Whether "raw" or printed, aluminium's naturally glossy surface provides the tube undisputed aesthetic qualities. No wonder why so many other materials try to imitate it.
- O Source of creativity & modern: Just like a work of art, designers are inspired by aluminium as a base material or as a finished product. For decades, aluminium has proved its high performance properties. Aluminium remains a very modern, trendy and stylish material giving real added value to its use in packaging.
- Innovative potential: Aluminium's surface provides an excellent platform for innovation.
- O Low energy consumption: Aluminium recycling is easy and efficient: The lightweight nature of aluminium limits greenhouse gas emissions during transport. Energy consumption during recycling requires only 5% of the energy necessary to produce primary aluminium.

A SUSTAINABLE MATERIAL

The focus on **sustainable packaging** is ever increasing and aluminium tubes represent an important and exciting solution on this journey. It is already widely known that aluminium tubes have the **great advantage** of being **both recycled and recyclable**. The Alltub group is pleased to bolster this positive image of aluminium tubes by publishing its first Environmental Product Declarations (EPDs) for the cosmetic & food markets. Verified & certified by a third-party, these EPDs are in accordance with ISO structures.

Specific Disclosures & Data – ALLTUB CENTRAL EUROPE:



Waste generation		2022	2023	2024
Hazardous waste	Tonnes	244	201,000	201,93
Radioactive waste	Tonnes	0	0,000	0,00
Other waste	Tonnes	662	571,000	581,91
Total		906,00	772,00	783,83

Waste recycling		2022	2023	2024
Recycled waste	Tonnes, #	718	635,400	637
Non-recycled waste	Tonnes, #	188	136,400	147,0



Social and governance aspects

Specific Disclosures & Data - HR

	Location	WORKFORCE			TRAININGS				ABSENTISM			HIRING vs DEPARTURES				EMPLOYEE TURN OVER		
B/U		FTE EoY	TOTAL WORK FORCE	C-level directly reporting to CEO	MANDATORY TRAINING HOURS [hours]	MANDATORY TRAINING COST [KEUR]	OTHER TRAINING HOURS [hours]	OTHER TRAINING COST [KEUR]	TARGET acc. AG POLICY	ACE target	actual [%]	INDEFINITE CONTRACT employees qtty	NEW HIRES	VOLUNT. DEPART	TOTAL DEPART	TARGET acc. AG POLICY	ACE target	actual [%]
Langenfeld/	Germany	54			98	2,00	333	8,00	9%	n/a	3,4%	100,0%	4	5	6	10%	n/a	11,1%
Kibo	Germany	153			445	11,00	802	20,00	9%	n/a	8,2%	87,3%	29	13	17	10%	n/a	11,1%
ADE	GERMANY TOTAL	207	225	1	543	13,00	1 135	28,00	9%	n/a	7,0%	90,7%	33	18	23	10%	n/a	11,1%
AIT	Italy	283	308	1	2230	22,00	3661	28,00	9%	n/a	4,6%	85,0%	41	9	21	10%	n/a	7,4%
AFR	France	214	216	1	798	22	1171	52	9%	n/a	11,2%	98,1%	- 48	26	46	10%	n/a	21,5%
ACE	Czech Rep.	312	312	1	2039	1,70	1470	21,56	9%	10%	10,1 %	84,6%	88	47	75	10%	1 5%	24,0%
AMX	Mexico	283	277	1	10646	18	NA	NA	9%	n/a	0,3%	93,0%	98	70	98	10%	n/a	34.7%

Specific Disclosures & Data - DEI

Location	Country	WOMEN TOTAL WOMEN TO		MANAGEMENT TOTAL	WOMEN in MNGMNT	WOMEN MNG %	M/W paygap
Langenfeld/	Germany	18	31%	5	0	0%	22%
Kibo	Germany	66	43%	2	0	0%	25%
ADE	GERMANY TOTAL	84	39%	7	0	0%	20%
AIT	Italy	140	49%	18	0	0%	19%
AFR	France	76	35%	8	3	38%	15%
ACE	Czech Rep.	126	40%	8	2	25%	43%
AMX	Mexico	132	47%	8	4	50%	38%

Specific Disclosures & Data – H&S

	Location	Country	ANY INCIDENTS TARGET acc POLICY	FATALITY INCIDENTS (causign death)	LTA	All recordable incidents	LTA lost time (HOURS)	lost days due to injuries	TYP. WORKDAY for lost day calculation	WORK HOURS	TRIR
	Langenfeld/	Germany	0	0	2	n/a	22,5	3	7,5	83910	4,76701228
Ш	Kibo	Germany	0	0	6	n/a	420,0	53	7,5	229779	5,22240936
	ADE	GERMANY TOTAL	0	0	8	n/a	442,5	56	7,5	313689	5,10059326
Ш	AIT	Italy	0	0	6	n/a	1496	199,5	7,5	425766	2,81844957
Ш	AFR	France	0	0	8		3169	452,7	7	303078	5,27916906
	ACE	Czech Rep.	0	0	5	38	1199,38	118,0	10	517616	1,9319341
IĽ	AMX	Mexico	0	0	9	N/A	3516	293,0	12	556000	3,23741007

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