



► **Sustainability Report 2009.**



proactive and responsible way, anchoring sustainability in our steering processes. We have only started. We are not in this for a short run, but we see this as a steep track to higher quality products and value creation for our company and our customers.

In 2009, we formulated our new Vision. We want to be Best-in-Class for our business and grow globally with our customers. A key initiative of this Vision is the sustainability program, which has been implemented to structure and align our efforts to work in an environmentally conscious manner. A number of projects have been initiated to develop more sustainable products and services and work out management and supporting programs.

At MAUSER we know we can only achieve true sustainability with the help of great people. Our people. Having the best team in the industry is part of our Vision, so in 2009 we took our HR management to a higher level. MAUSER wants to be an attractive and professional employer. We invest in training and we improved our safety management and culture. We have extended our compliance management and Code of Conduct to have a better awareness and control of our business worldwide. And we started a Lean and Green program to decrease the environmental impact of our production activities.

It is important to share our commitment to sustainability with all of our stakeholders. We want to be transparent about our achievements and goals, and we seek partners for cooperation: Together with our customers and other partners we can make the change. With a number of customers we discussed those issues they find most important in our business. They mentioned aspects like footprinting, lightweighting and recycling. We are working on these aspects. In this report you will find many more examples.

This is the first MAUSER Sustainability Report and we hope you enjoy reading it. In the coming years, we hope to expand this report to encompass all aspects of sustainability. Of course, we are interested in receiving your comments and questions. We look forward to your reaction on: sustainability@mausergroup.com

Brühl, June 1



Dr. Clemens Willée

We protect your business and our planet.

For MAUSER, sustainability is a key business driver. We recognize how well sustainability fits within the unique business model that we have. Together with our subsidiary NCG, we are very well positioned in the reconditioning business. We carry out research for light weight materials, reducing the need for raw materials and energy. We recycle the plastics we use, moving from single-use products towards product cycles. To optimise logistics and reuse, we move from being just a producer to a full-service provider. From drums to cycles.

We realize that our customers make tremendous efforts to improve sustainability. As a supplier, we can enhance their programs. For us, it seems logical: We create extra value by investing in solutions that are more profitable for our customers and at the same time better for the environment. It is our drive and vision to lead the next generation of industrial packaging solutions.

In the last quarter of 2008, the worldwide financial crisis erupted and MAUSER took immediate action. We initiated measures for cost reduction and efficiency that were operational from the beginning of 2009. These measures included the difficult decision to reduce our staff. Although it has been a difficult time, the measures had the anticipated results. MAUSER's financial stability even improved. From the third quarter of 2009, we saw the market slowly begin to recover and we were able to add to our staff again.

We are enthusiastic about the opportunities and developments in sustainability, but we are modest too. MAUSER has grown very rapidly in the past five years. Country by country we expanded into the global group structure that we are today. Now it is time for us to truly become a global company, dealing with the relevant developments in a

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► **Environmental visionary** – “For almost 35 years MAUSER has been a significant economic force in Brühl. As a local employer and tax payer MAUSER makes an important contribution to the well-being of people in our region, which is very much appreciated. I have the impression that sustainability is not a short-term issue for MAUSER, but a central corporate concern. They have always been open to all kinds of innovations saving resources and money. That’s why I see them well prepared for the future.”

Michael Kreuzberg, Mayor of Brühl

Organizational profile

MAUSER is a global leading producer of industrial packaging with a strong tradition of over one hundred years. We are a full service provider offering plastic packaging, steel and fiber drums, IBCs, reconditioning services and machinery for packaging production.

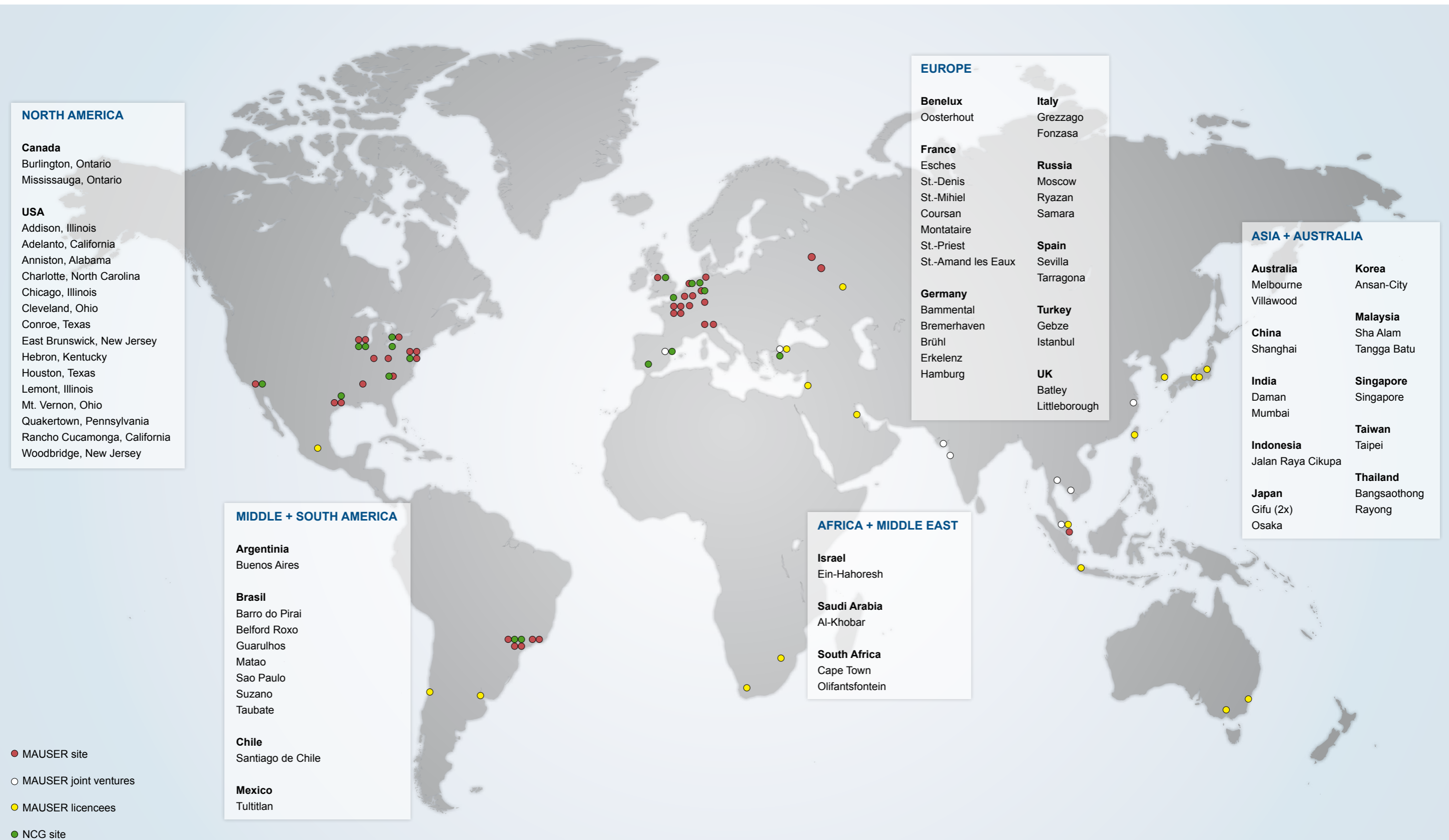
During the last decade, MAUSER’s “buy-and-build” strategy has extended the company’s international reach by the acquisition of several companies. The sales volume quadrupled from 250 million Euros in 2005 to one billion last year. Now, the MAUSER Group has approximately 4,000 employees.

The MAUSER group has more than 50 production plants covering 32 countries in Europe, North America, South America and Asia. In addition to these fully owned plants we have joint ventures in China, India, Malaysia, Thailand, The Netherlands and Spain. To further increase the coverage in a number of markets we work with two partnering networks: one for plastic packaging (MIPI®) and one for the production of steel drums (Drumnet®).

In 2004, the MAUSER Group acquired the National Container Group (NCG), which at that time was only based in North America. This acquisition made MAUSER’s focus change from just a producer to a full cycle service provider, with IBCs becoming a central product. Life cycle management and saving resources have become the main direction for the future organization and the product portfolio was expanded to include reused products. When this strategy was proven to be successful in the U.S., it was implemented in Europe. Having now almost finalized the extension to Europe we are starting to build our business in Asia. The acquisition of NCG was also a corner stone for the importance of sustainability as NCG delivers container management and reconditioning services to the industry.

The MAUSER Group headquarters are located in Brühl, Germany.

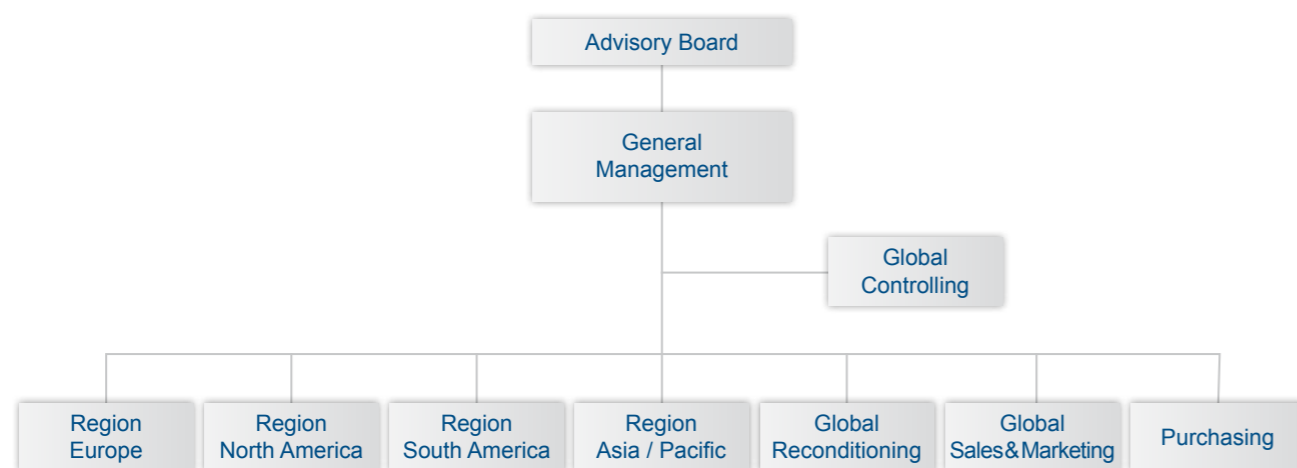
MAUSER Group – Global geographical presence



Ownership and operational structure

MAUSER Group is majority owned by Dubai International Capital LLC, a Dubai based international investment company. Key Management Members of the Group hold the remaining participation of about 15%. At the center of the group structure is MAUSER Holding GmbH, which owns and controls the operative subsidiaries in 16 countries. All legal entities can be found on www.mausergroup.com/en/14.html and www.ncg-europe.com/facility_map.

MAUSER's organizational model has a matrix structure with Regions, Global business functions and Global corporate functions. The Regions run the day-to-day business and are fully responsible for the profits in their region. The Global Business Functions steer activities across regions, drive new concepts and enhance the business model. The Global Corporate Functions ensure the administrative and legal framework and drive the corporate policies.



Management Board

MAUSER's Management Board consists of the following members:

- Dr. Clemens Willée – Chief Executive Officer (CEO)
- Winfried Klar – Chief Financial Officer (CFO)
- Louis Pourdieu – Chief Operating Officer (COO)
- Björn Kreiter – Head of Group Controlling
- Klaus Beckmann – SBU Manager Europe
- Ronald M. Litchkowski – SBU Manager North America
- Robert Selke – SBU Manager South America
- Peter H. Schäfer – SBU Manager Asia / Head of Reconditioning Division
- Alexander John – Head of Global Sales and Marketing

The CEO, CFO, COO and Head of Group Controlling are also members of the Holding Board.

Advisory Board

MAUSER has an Advisory Board consisting of five members, appointed by the shareholders. The board supervises the management by means of a remuneration committee, an audit committee and an investment committee. All names and positions are listed on the MAUSER website. The working procedures define and describe what the management can decide and what needs to be approved by the board.

There are four to five formal meetings with the Management Board and the Advisory Board over the year. Apart from this there are monthly business reviews in which part of the Advisory Board participates. In these reviews the main issues are discussed. The Advisory Board fully approved and supported the sustainability initiative launched in 2009.

Governance of sustainability

There is a steering committee for sustainability with the CEO, the COO and three other members including Mr. Elliot Pearlman, one of the founders of NCG, who contributes his expert knowledge and experience to guide MAUSER/NCG in sustainability matters.

Main customer groups

MAUSER has a well balanced customer base of international blue-chip companies plus a diversified portfolio of regional/national accounts. While our top 10 customers contribute approximately 20% of our revenues, no customer accounts for more than 5% of the revenues. The majority of our customer base is in the chemical and lubricant industries, however we are also in the food and pharmaceutical sectors. In 2009, 65% of the revenues came from customers in the chemical industry, 20% from the lubricant/ petrochemical industry, 5% from the pharmaceutical sector, another 5% from the food & beverage sector and 5% from various sectors.

Key developments in 2009

- **January 2009:** NCG starts a new joint venture in Bathley near Manchester/UK with TDG. NCG opens a new reconditioning site in St.-Amand near Lille/France.
- **February 2009:** Second steel drum line in Malaysia opened.
- **March 2009:** Start of the new joint venture MAUSER Reyde Ibérica S. A., a strategic alliance for the production and sales of IBCs in Spain.
- **March 2009:** A tube center for IBC cages inaugurated in Erkelenz, Germany.
- **April 2009:** Operation of a 4-layer drum blow molder started in Bammental, Germany.
- **May 2009:** Start of MAUSER Russia. As of October 2009, a new steel drum factory near Moscow supplies the oil and chemical industries in Russia with state-of-the-art MAUSER products and services.
- **September 2009:** A second fiber drum plant in Charlotte, NC, USA starts operations.
- **November 2009:** Installation of a 3-layer drum blow molder in Grezzago, Italy.
- **December 2009:** Acquisition of 100% of the shares of Tankpool (NCG Brazil) and Buchtenkirchen (NCG Germany).
- **During 2009:** Transfer of an IBC bottle blow molder to California, to optimize NCG logistics in North America.

Vision

Recently we have developed a company-wide shared Vision to shape the company. This Vision encourages each individual within our organization to develop and contribute their ideas and skills. And it calls on the management to honor the Vision's promises. We have combined this with the set-up of strategic guidelines and core values.

We lead the next generation of industrial packaging solutions.

The four main statements are:

- ▶ We are Best-in-Class in our business
- ▶ We grow globally with our customers
- ▶ We focus on sustainability and ecology
- ▶ We have the best team in the industry

Core values

- Hands-on leadership
- Empowerment of individuals
- Passion for what we do
- Striving for excellence
- Integrity and respect for each other
- Value diversity and open communication

Strategic guidelines

- Achieve business excellence
- Generate further growth
- Focus on innovation and customer orientation
- Empower our people

For us to be able to 'live' the Vision, understand the core values and keep the focus on the strategic guidelines, all of the aspects mentioned above have been defined in more detail to make them more concrete, measurable and achievable. For each of the four main Vision statements, projects have been initiated throughout the company.



► **Keep this high on the agenda** – “At Huntsman, sustainability is high on the agenda. We feel it is important and we expect our suppliers to value sustainability as well. This is why we evaluate our suppliers on several sustainability issues like footprinting and environmental performance. As we are starting to work with MAUSER we feel that we share the interest in sustainable development. Our advice would be to keep this up as this is the future of our business. Furthermore, it would be valuable if MAUSER could continue to search for innovative solutions like bioplastics.”

Richard Day, Purchasing Manager Packaging, Huntsman

Management approach to sustainability

After the years of building up our global network, we want our family of operating companies to become truly global. To support this development, we need the appropriate management systems. In 2009, a number of steps were taken to realize this.

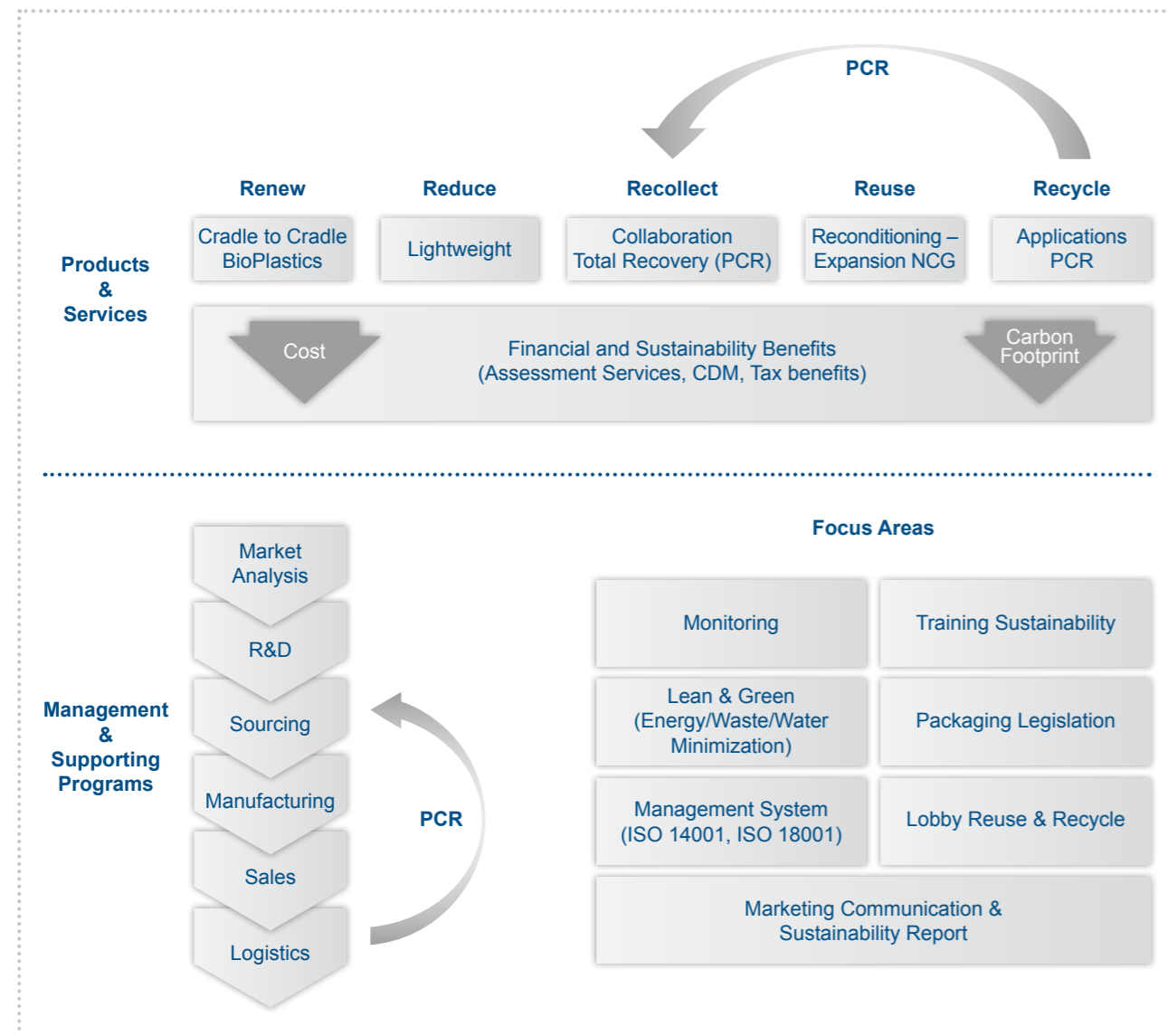
- As mentioned, we formulated a new Vision, placing the people we work with in the spotlight.
- We strengthened the global HR department. We want to be an attractive and professional employer. We will discuss this in more detail on page 23.
- We improved the compliance department and developed a compliance program with a Code of Conduct, training and audit programs. We will discuss this further on page 29.
- We formulated KPIs for safety and improved our safety management, see more on page 24.

The availability of raw materials and the increasingly serious situation with regard to energy and climate are key issues for MAUSER. Both in our products and services and in our own business processes we address these issues in a number of ways.

Sustainability program

MAUSER recognizes sustainability as the way forward for the company to respond to the market needs, and wants to integrate it in the organization in a structured way. We started a process to implement our sustainability initiative throughout the company. We set up a sustainability program covering a broad range of plans for our products and services and added management and supporting programs. We discussed this program with a number of our key customers to ensure we are heading in the right direction and that we will be working toward our goals in cooperation with our customers. Our main goals for increasing the sustainability of our products and services are summarized under the headings Renew, Reduce, Recollect, Reuse and Recycle. We will go into more detail in the chapter “From drums to cycles: Sustainable products and services” on page 15.

Concept Sustainability Program



Integral management system

MAUSER works with an integral management system for Safety, Health, Environment and Quality (SHEQ). In 2009 we started using a Score Card with a number of KPIs to monitor the most relevant issues. We use KPIs for Leadership, Safety, Customer Satisfaction, Productivity, Cost and Morale. In the coming years, more KPIs for the relevant sustainability issues will be developed, so we can monitor and steer them in a more transparent way.

Environmental management

We have chosen to develop our environmental management systems further and aim to have all MAUSER plants ISO 14001 certified in 2010. We started a Lean and Green program to monitor and improve the way we deal with energy, water and raw materials in our processes.

► **Be innovative** – “I see sustainable value in a broad sense including environment, efficiency and quality. Recycling and reconditioning are important to us – as long as the quality is perfect. We have been working with reconditioned packaging since its introduction two years ago and our customers are satisfied with it. If I was asked what MAUSER should do? I would definitely say: carry on to be innovative!”

Oliver Smeyers, Global Supply Manager, Dow Corning

MAUSER innovation process

In 2009 we defined innovation as a core process of our company. Product development has become a corporate function to strengthen and focus our innovation capabilities. We manage innovation as a global network with strong regional input. The approach of this process is not to have an academic research program, but to work on practical solutions that address the specific needs of our customers, e.g.:

- Improved vibration performance with our IBC cages to comply with upcoming regulations
- Open top drums made from 100% recycled plastic material
- Multilayer tight head drums with a middle layer from recycled plastics
- Specially designed composite IBCs for transport of Diesel-Exhaust-Fluid (DEF), after introduction in Europe recently entering the US market
- Tailor-made steel or plastic drums for better ISO-container volume utilization
- Conical steel or plastic containers for improved transport of empty packaging

MAUSER Excellence Program (MEP)

In the MAUSER Excellence Program (MEP), MAUSER identifies projects representing improvements on a broad range of business aspects, including market penetration, industrial strategy, innovation, people and procurement. All employees can give input for the program. Ideas endorsed as MEP projects are carefully analyzed and monitored. At the end of 2009, 12 projects were already completed and 44 projects were in progress while 54 were waiting to be launched.

Stakeholders

All our sustainability developments are cooperations with partners. We ask customers to let us know which issues are most important to them within their partnership with MAUSER. We look for customers that are willing to invest in research on lighter materials, lean design, and recycling options. We develop full service solutions for customers and carry out research on light weight materials in cooperation with clients and suppliers.

We are heavily engaging in associations and regulatory bodies on different levels, filling positions advising working groups, as presidents, board members and/or experts. We do this in an open minded way, because we are convinced that cooperation is the key to explore and implement sustainable innovation in the industrial packaging sector. Examples of organizations that we are involved in are the European Association of Steel Drum Manufacturers, SEFA, the Global Association for Plastics Packaging Manufacturers, ICPP, the North American Association of Reconditioners, RIPA and the Industrial Packaging Alliance of North America, IPANA in which a number of trade associations are represented.

We are not directly involved in or influencing politics and do not offer any contributions to political parties or politicians.

When developing our sustainability program, MAUSER started to bring the dialogue between stakeholders and the management to a broader level. We want to cooperate with more of our stakeholder groups in understanding how we can combine our efforts to improve sustainability for all. We have carried out a stakeholder analysis, listing clients, suppliers, associations and other parties with whom we want to cooperate and communicate. We will be discussing these opportunities in future reports.



► **Initiative** – “Suppliers with a proactive sustainability approach are important for Henkel’s selection of strategic partners. We expect packaging companies to show creativity and initiatives in the area of sustainability and innovation. Our strategy with NCG was to optimize our supply chain and switch to reconditioned packaging where applicable – and so we did over the past 18 months. It is a positive relationship that supports Henkel’s objectives on sustainability and environmental awareness.”

Stephanie Learman, Purchasing Director, Henkel

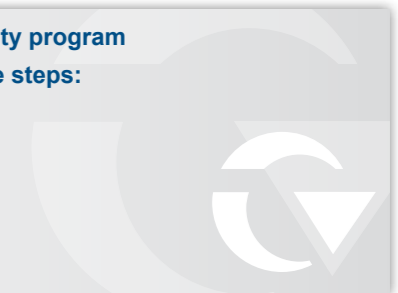
From drums to cycles: Sustainable products and services

For MAUSER, packaging and the environmental impact of this packaging are our primary concern. MAUSER is engaged in many activities to reduce the environmental burden of our packaging materials:

- We conduct research to develop light weight packaging, saving raw materials and energy for transport, without compromising the packaging’s quality or performance.
- We optimize our company’s geographical footprint to improve our and our customers’ packaging logistics for transport and recollection.
- We are frontrunners in reconditioning, reuse and recycling, closing the materials cycle and thus saving raw materials and money.
- We are a new packaging manufacturer with a core business in after sales.

In our sustainability program we build upon five steps:

- Renew
- Reduce
- Recollect
- Reuse
- Recycle



Renew

MAUSER is aware that renewables and the use of renewable feedstock can play an important role when it comes to sustainable products; however, performance, availability and overall environmental impact of renewables have to fit our and our customers’ industries. We are currently in the initial stages of exploring the potential of renewables, as renewables clearly are not yet in the focus of the industrial sector. We are looking for opportunities to work with renewables in cooperation with customers and carefully investigate any opportunity that arises.

Reduce

Reducing the amount of materials used wherever possible is of significant importance for the effective use of feedstock. Doing so has both direct and indirect impact on environmental performance, such as use of energy in manufacturing and/or transport logistics. However it increases the complexity and variety within the production process and therefore is not automatically to be seen as a direct cost saver. “Fit for purpose” is our philosophy to define minimum needed material input, without compromising the overall packaging quality level. Less packaging weight means less dependency on volatile raw material pricing and less cost for packaging disposal. We carefully explore weight reduction, at the same time improving the possibilities for reuse and recycling. As an example, we are engaged in research and development of advanced materials, such as new mono- or bi-modal plastics and/or nano technology based compounds, in close cooperation with our suppliers.

Recollect

When a container is emptied at the end user's, its life cycle is not yet over. Extending the life cycle of industrial packaging starts with recollection. Through NCG, MAUSER has transformed from a mere producer of new packaging to a full service provider around the industrial packaging life-cycle. By increasing the return rate of industrial packaging and useable components, we can decrease the volume of raw materials needed and supply our clients with high quality service on a more sustainable level. Initially having focused on recollection service for IBCs and PE drums we now aim for total recovery of all industrial packaging materials. Alone in its field, NCG is not limiting its services to only MAUSER packaging, but as a principle recollects all packaging, irrespective of brand and origin.

Reuse

Reusing of industrial packaging is NCG's core business. Originally based in the USA, the NCG network has extended its operations to Canada, Brazil and, most recently, Europe. Further expansion to Eastern Europe and Asia will make NCG the first truly global reconditioning network for different kinds of rigid industrial packaging, regardless of their origin or manufacturer. Regional proximity to customers, combined with professional networking is the key to NCG's success story. For both environmental and financial reasons, the physical distances in the network are most relevant. We are currently conducting research to further optimize these distances.

Extending the lifecycle of industrial packaging needs approaches from many directions. MAUSER/NCG is able to offer a complete range of services. Depending on industry segments and customer specifics, we provide new packaging, we remanufacture, we recondition and we launder. We offer interplant supply programs, as well as independent return services and recycling.

Long-term experience and profound market knowledge enable us to dissect packaging waste streams and, together with our customers, explore more sustainable uses of them. (Re)use of packaging is also a matter of trust: trust in quality and environmental security. To help encourage that trust, NCG North America, for example, provides an environmental indemnification insurance policy as a reliability commitment, unique throughout the reconditioning industry.

Recycle

Throughout the different regions of the world, MAUSER/NCG is actively exploring the use of recycled materials wherever possible. Being a generator of recycled materials on the NCG side and a user of recycled materials on the MAUSER side, we work together in the different areas to close the material circle. We have gained expertise in the recollection, handling and sorting of packaging waste, cleaning and recycling of materials and processing of recycled materials to new packaging. We investigate how we can further increase reuse of resin, for example, using multilayer packaging technology to provide a virgin inside and outside layer and a middle layer from recycled plastics. For customers, this is an interesting way to make their packaging more sustainable; however, we still see the need for a change in culture in certain regions.

MAUSER North America purchases Post Consumer Resin (PCR) from internal and external markets and integrates the material it purchases into the processes for mono- and multi-layer containers and accessories. In 2009, for example, we used 2.3 million kg of PCR material across the division in North America, displacing purchases of virgin resin. From our global perspective, the recycling practice within industrial plastics packaging is most advanced in South America (Brazil). There, already about 20% of our used plastics feedstock is generated from recycled plastics, where as in North America and Europe we are currently at a level of 4-5%. Our clear target is to further increase the amount of recycled material being used in these regions. Offering a broad packaging portfolio, not only focusing on specific packaging designs and industries to be served, puts us in the perfect position to do so without compromising relevant quality levels.

Life Cycle Analysis (LCA) and carbon footprint

Like many industries these days, we are often confronted with requests from our customers about carbon footprint and life cycle data of our products and services. Our customers are interested in environmental background information and we clearly appreciate and encourage this interest. However, in our opinion, providing the blank carbon footprint of our packaging cannot be the final goal – environmental impact of packaging is always to be seen in relation to the contained product and only individual full life cycle analysis, including the packaging's lading, will provide an objective view.

As a first step, we therefore initiated external “cradle to grave” life cycle analyses on all of our major product groups. From manufacturing of new plastic drums to reconditioning of steel drums to washing of composite IBCs we are now able to judge the environmental impact of packaging and services individually. Furthermore, having identified major impacts on environmental performance per individual packaging has formed the basis to actively develop and improve sustainability of our products. Providing reliable and comparative data on different types of rigid industrial packaging once more reflects our company's strength of being a full liner company. As with our technical expertise in the past, we are ready to partner with our customers to come up with the most sustainable packaging choice for their individual application and logistics.



► **Footprinting** – “Bayer is actively working on developing new packaging and welcomes cooperation with MAUSER. We think of different materials, full recycling and new business models. Sustainability is not about stories; it is about real innovation and improvement. We have to make it practical and tangible. If I was asked to give advice to MAUSER, I would definitely tell them that they should footprint anything they do! It helps to make sustainability more concrete and realistic.”

*John Hurrel, Sustainable Development Manager: Packaging & Internal Processes,
Bayer Crop Science*

Environmental management

MAUSER's environmental management is growing and professionalizing. During the last years, we have implemented ISO 14001 throughout MAUSER globally, finishing this accomplishment with the certification in Brazil in 2010. We are now evaluating if and how we could implement ISO 14001 in NCG.

Our Lean and Green approach covers the use of energy, water and waste. We have started to develop monitoring systems to follow the performance of our different plants more closely. At the same time we aim to build up a database showing the relationship between use of energy and greenhouse gases. The next step will be to formulate KPIs and start benchmarking.

A number of activities have already been started. To mention a few examples from North America: energy-efficient lighting, cooling with outside air instead of using compressors and optimizing compressed air systems. We also use oil-water separators and filters to reclaim used oil and, are investigating a variety of innovative options for the years to come. In addition to the technical measures, organizational measures were also taken. We started with monthly cross-functional team meetings and published monthly plant monitor reports. Another interesting development is our intercompany shipment reduction. By moving product lines to the most cost-effective location, we reduce MAUSER's carbon footprint and create freight savings.

Energy

The amount of energy needed to melt plastic as well as the energy needed to cool down the blow molded products is a fixed parameter. However, the total amount of energy used to transform the plastic resin into a homogenous melt and the later cooling process in the mold and downstream equipment is highly dependent on the layout of the respective components in production lines. The processing of plastic resins has been a core competence of MAUSER for more than 40 years.

With our own engineering and machinery division, MAUSER develops and continuously improves extruders and extrusion heads allowing the processing of polyethylene at very low temperatures. The result of this leading processing technology is maximum efficiency of the melting process with minimum energy consumption. On the cooling side, MAUSER has increased the use of blow-air-booster-

kits (patents granted), considerably reducing the overall volume of compressed used air in the blow molding process.

There is room for improvement in the amount of energy needed for our overall production. In 2009 we started a pilot program for reduction of energy use. As a first step, three energy audits were carried out in different types of plants: in metal (Creil, France), plastic (Bammental, Germany) and reconditioning (NCG Buchtenkirchen, Germany).

The audits resulted in a long list of potential savings, lighting being one of the most promising potentials. This first pilot will be used as a benchmark for the three divisions. As a next step, the improvements will be implemented throughout the company. We estimate to realize energy reduction in the range of 15-20%.

	Electricity (kWh)	Gas (m ³)	Water (m ³)
All regions*			
Europe	126,818,944	3,810,681	53,030
North America	100,677,111	2,542,456	664,004
South America	36,533,388	592,634	38,451
Asia (1 metal plant)	612,380	35,176	782
Total worldwide	264,641,823	6,980,947	756,267
Europe			
Plastic (10 plants)	119,268,011	1,976,278	35,960
Metal (7 plants)	6,906,836	1,589,269	8,926
NCG (3 plants)	644,147	245,134	8,144
Total Europe	126,818,994	3,810,681	53,030
North America			
Plastic (10 plants)	85,483,097	2,263,642	26,024
Metal (3 plants)	11,652,536	274,085	35,179
NCG (6 plants)	3,541,478	4,730	602,801
Total North America	100,677,111	2,542,456	664,004
South America			
Plastic (3 plants)	34,921,777	169,534	38,451
Metal (2 plants)	1,611,611	423,100	0
Total South America	36,533,388	592,634	38,451

* The metal plants in South America do not use water for the production. Joint ventures are not included. A limited amount of oil is used for forklifts and heating; this was not measured.

Water and wastewater

MAUSER does not use much water in the production processes. The water we use is mainly intended for cooling and is used in closed cycles. NCG uses water for washing and creates wastewater. In a number of plants, we apply advanced systems for the reuse of water (using closed loops and microfiltration). Plants washing plastic drums can reduce their water use per washed drum by about 40% through improved water technology. Plants washing IBCs have reached reductions of over 60% per IBC washed.

Usually, regular drinking water is used, but in some cases groundwater is used for heat exchangers. Most of the MAUSER and NCG operations are not in areas with water scarcity. California is an exception, where we are naturally especially careful in our use of water.

Some of NCG's plants have their own wastewater treatment plants; in other plants wastewater is discharged into sewers or tanked away as hazardous waste.

Waste

The main source of waste at MAUSER is from paints and coatings for steel drums. In Germany, the volume of this waste has been reduced drastically by process changes from spray-painting to painting in advanced cabinets. This reduced the paint waste from 400 to 200 metric tons in 2009.

The majority of plastic materials are reused in the process itself. When this is not possible, plastic waste is used as a source material for generating recycled plastics.

Use of raw materials

For the plastic, steel and IBC production, MAUSER uses a range of raw materials. The main materials are plastic, both for the use in products and as films and foils, and steel. Amongst many miscellaneous materials, we also use large volumes of wooden pallets.

	Europe	North America	South America
Polyethylene and granulate for products (kg)	91,824,176	71,796,850	13,018,000
Plastic, films and foils (kg)	3,122,856	7,846,567	0
Steel (kg)	81,329,202	72,390,634	23,768,000
Pallets (pieces)	1,070,546	20,265	14,015



► **Zero lost time accidents** – “It is a testament to our Houston team to be awarded the MAUSER Safety Award for Best Safety Result in 2009. With zero lost time accidents in 2009, it is clear that this team is dedicated to making Safety an integral part of their culture. The entire North American team is proud of Houston’s success and working to achieve our ultimate goal of zero accidents throughout the Strategic Business Unit.”

Elizabeth G. Miller, Vice President Finance & Treasurer MAUSER Corp. Houston, US

People

HR Philosophy

MAUSER aims to have the best team in the packaging industry. All HR processes and projects are inspired by this vision. Organizational Development implements our strategic guidelines and core values such as Business Excellence, Innovation, Customer Orientation and Growth.

Starting in Europe, we have in 2009 aligned our organization to our strategic objectives, focusing on customer

needs and strategic growth. The organizational model focuses on lean structures and clear reporting lines. While the Executive Committee and Global Functions outline clear strategies and guidelines, responsibilities are delegated to the Regions and managers are empowered. This operating model aims at an integrated and collaborative team spirit which reflects our core values.

Facts and figures

In the tables below we present the HR key figures at the end of the year. There is generally a low turnover rate worldwide. As an example, in the US we see average figures of below 1% in 2009.

2008	Totals	SBU Europe	SBU NA	SBU SA	SBU Asia	Holding	Machinery division
People total	4,185	1,449	1,105	952	531	57	92
Blue collar	2,946	898	825	825	345	1	52
White collar	946	419	258	82	99	49	39
Temporary	294	132	22	45	87	7	1

2009	Totals	SBU Europe	SBU NA	SBU SA	SBU Asia	Holding	Machinery division
People total	4,033	1,406	1,136	797	551	69	73
Blue collar	2,637	807	822	619	343	1	45
White collar	897	388	240	76	109	57	27
Temporary	498	211	74	102	99	11	1

Salaries, annual appraisal, employee benefits

As an employer, we want to offer competitive salaries and benefits into the global markets. In order to retain high impact performers and attract high potential candidates with attractive working conditions, MAUSER puts much effort and resources in evaluating jobs and benchmarking salaries and working conditions against the industry and the general market. The salaries of the top three levels in the company consist of a fixed salary and a variable part that is linked to the financial performance of the company.

For historical reasons the amount of employees who receive an annual performance appraisal and development review differ from region to region. While in Europe 30-40% of staff is covered, in Singapore and the US all employees receive an annual appraisal. In Singapore employees are eligible for annual leave, overtime payment (non executive) as well as transport and attendance allowance (operators only), paid sick leave and some medical expenses. In Germany MAUSER provides job tickets, health management benefits and – in some cases – kindergarten allowances. On all levels a significant part of the MAUSER workforce is covered by collective agreements with the trade unions, but the coverage differs according to the region. Health and safety issues are covered in the agreements.

Stakeholder engagement: unions, local communities

In all regions MAUSER is working closely with works councils and trade unions. In almost all regions employee representatives represent the interests of the workforce. In Germany, for example, MAUSER is represented in federal tariff bodies negotiating the relevant collective agreements.

MAUSER traditionally has strong roots within the local communities. For example, there is a very successful apprenticeship program in Brühl covering about 40 apprentices in Germany, most of which are taken over after apprenticeship. Many of MAUSER's employees have been apprentices with the company before and stayed with us after their apprenticeship. Intensive cooperations with local schools allow us to attract high potential students from the local communities every year.

Safety and incidents

Safety is one of the most important issues in our company and close attention is paid to our safety culture. Every MAUSER plant uses these indicators:

KPI	2008	2009	Target 2012
FR0t Number of accidents with at least one day incapacitation*1 million/worked hours	26.4	16.6	5
FR1t Number of accidents without incapacitation*1 million/worked hours	Not available	23.2	5
SR0t Severity rate (average lost working days per accident)	Not available	23.7	2

MAUSER established a Safety Award for the plant with the best results and for the plant with the best developments in safety. The 2009 winners are Houston, USA (best results) and Bammental, Germany (best development). Houston had counted no lost time accidents in 2009 and beat out over 50 facilities around the world for the award. Bammental had counted only one accident in more than 200,000 working hours The indicator FR0t changed from 24.23 in January 2009 to 4.26 in December 2009.

The KPIs for the safety management do not yet cover all NCG plants. They will be extended to NCG in 2010.

Diversity, equal opportunities, human rights

At the Top Management and Global Leadership level MAUSER is represented by managers from all regions and backgrounds. Also, top managers from all regions are members of the company's Executive Committee and ensure global agreement on strategic decisions. MAUSER follows equal opportunity policies on a worldwide scale, generally provided for by law. In Germany for example, the constitution and the *Betriebsverfassungsgesetz* (works council statutes) require equal opportunities for males and females. Job descriptions and pay structures at MAUSER make no

difference between male or female employees. The works council generally consists of male and female representatives. In different regions different bodies are implemented in order to deal with discrimination cases. In Germany, for example, there is a *Beschwerdestelle* (internal body for discrimination claims), in the US, discrimination cases would be filed with the EEOC. In the last five years there has only one case been reported in the USA, which is being disputed; in all other regions, no complaints have been reported.

There are no operations identified as having problems with regard to freedom of association, collective bargaining, child labor, or forced or compulsory labor. We adhere to all local/state/federal mandates surrounding these issues. Any violations are addressed immediately and could result in termination. No incidents were reported involving the rights of indigenous people.

Training, education, development

MAUSER group is audited worldwide according to both the ISO 9001 and ISO 14001 standards. One focus of the audit is training activities and employee development at all MAUSER sites. In recent years MAUSER had no findings that could result in the loss of certification.

There are, however, currently only regional figures available regarding average hours of training per year and employee. A current project focuses on making this extensive data centrally available. We expect to be able to include Key Performance Indicators concerning training and education at MAUSER in our next annual report.

In 2009, MAUSER's first international sales training courses were conducted in North America and Europe. While this program continues, others will follow. At the headquarters in Brühl, there are regular language courses for all levels in order to strengthen people's language skills. Currently, the focus is on training people on an individual basis and according to their specific needs. As part of our future succession planning and talent management program, we expect to supplement this by systematic training, such as Excellence and High Potential Programs.

Global Leadership Team

In 2009, MAUSER's CEO initiated the Global Leadership Team (GLT). A group of over forty people from the second management level were invited for a two-day conference in Germany. The vision, developments and targets were discussed. We consider it is most important to involve medium and lower management levels of MAUSER to use their ideas and visions as input for developments, to better coordinate global functions and to create room for management development. The CEO has quarterly conference calls with the GLT and meets with them on a yearly basis.

Crisis management

The worldwide financial crisis had its impact on MAUSER in 2009 and made it a turbulent year for the employees. The required business continuity forced us to let go about 750 employees, 500 regular and 250 contractual. We also integrated and shut down factories. This was needed not only for crisis intervention, as it gave us the opportunity to reduce our footprint and to position our factories and equipment closer to the market. By the end of 2009, the situation had improved to such an extent that the number of employees was growing again.

Future plans

After MAUSER's fast growth in recent years, we are now stressing a global approach. Among the most important processes is a target agreement process, which is currently implemented in the organization. At a later stage, this will be supported and refined by a Performance Management Review. Salary increases will be administered regionally as in the past, but steered and monitored centrally. Overall, there will be consistent worldwide Compensation & Benefits guidelines. Recruitment at the top level follows a unified approach. In the near future this will be supported by a competency model that will enable us to improve succession planning and talent management.

Management Development will be a further focus of the near future. This includes bringing people together in international management meetings and training.



► **Responsibility** – “Acting responsibly is very important for almost all companies nowadays, including the packaging industry. End customers from the chemical industry expect their suppliers to act responsibly. In fact, before DIC acquired MAUSER in 2007, the company’s Corporate Responsibility Profile was one of the crucial criteria to be considered. I think, with their reconditioning business and services they are well positioned to make a difference in the market. That’s why I’m very optimistic that MAUSER will expand their leadership position.”

Peter Jansenberger, Managing Director Dubai International Capital

Finance

From 14 October 2008, the financial crisis impacted manufacturing firms, including MAUSER. 2008 had brought the best financial results in history, which were tempered in the last 2.5 months of that year.

MAUSER managed the crisis well due to very efficient and fast measures. By keeping our liquidity stable at a sufficient level, no material financial issue occurred. Based on a capital injection by the shareholders, net debt could be reduced by the end of 2009 by 59 million Euros as compared to 2008.

Figures in 1,000 Euros*

	2009	2008
Revenues	822,588	1,017,094
Operating costs	603,458	782,846
Employee wages and benefits	127,700	134,533
Payments to providers of capital	47,554	51,918
Payments to government	4,215	5,530
Employees	3,534	3,891
Temporary labor (Non-employees)	498	294
Total	4,033	4,185

* This data includes MAUSER and NCG and joint ventures in which MAUSER and NCG take a majority share, see also p. 33, Reporting principles.



► **Compliance worldwide** – “As one of the premier companies in its field with a truly global reach MAUSER operates in many different legal jurisdictions and cultures. We take responsibility for complying with local laws in all countries we operate in. Our new compliance management is set up to fulfill all compliance requirements and to consult and support our employees throughout the world. We wrote a Code of Conduct and set up a global program in this context. Compliance is reviewed systematically by internal audits. So far, we are doing well.”

Dr. Martin Seiling, Chief Compliance Officer

Compliance

In 2009, the MAUSER compliance program was initiated to further strengthen the MAUSER compliance department. A Code of Conduct was formulated to function as the backbone of this program.

The Code of Conduct is built around four central themes: Trust and Reliability, Sustainability, Responsibility and Openness and Respect.

The Code of Conduct covers a number of issues. Compliance with laws and regulations is a priority, followed by internal employee issues including leadership culture,

fairness and tolerance. It further covers anti-corruption, cartel law and external trade law, including restrictions on countries with human rights issues or links to terrorism. By covering issues such as child labor, anti-discrimination and cartel law, MAUSER wants to protect local communities to which the activities of MAUSER are related. The full Code of Conduct is available on the internet at www.mausergroup.com/en/company/415.html. A number of guidelines that deal with specific areas of interest are accessible for all employees via the intranet. The Code of Conduct effects operations as well as investment agreements.

The Code of Conduct is in line with the international standards as used by the IDW, the German Institute of Public Auditors. These include standards like the OECD guidelines for multinational enterprises, the PACI principles for countering bribery and the Code of Conduct of the BME, the German Association for Materials Management, Purchasing and Logistics.

For the implementation of the compliance program, a roadmap was worked out. After the initiation of the program and the development of the codes, an organizational structure was implemented. There is a Chief Compliance Officer assisted by Compliance Officers at the SBU level and Compliance Officers at functional levels, who function as advisors to the SBU Compliance Officer. In addition, Compliance Trustees have been appointed for each operational legal entity.

To raise awareness about compliance and about the MAUSER policies, training is carried out for the upper and middle management at local subsidiaries. There are trainings for all relevant functions, to raise employee awareness of the issues and risks. For instance, all sales people were trained on issues pertaining to corruption.

As part of the Corporate Governance Framework of the MAUSER Group, a Global Internal Audit function was established at the corporate headquarters in 2009 in order to perform audits, special projects and assessments designed to evaluate and improve the system of internal controls. The implementation of compliance procedures and the observance of the Code of Conduct are reviewed

by the Global Internal Audit function. Sample tests are performed during its fieldwork at the various MAUSER companies worldwide. The audit plan is based on a risk-oriented approach, related to the different risks and risk levels in the specific regions. The audit plan is agreed on and approved by the Management Board on a yearly basis.

When starting their work with MAUSER, managers and other employees are required to fill in a questionnaire regarding their other activities as a screening to avoid possible conflicts of interest.

MAUSER believes in the strictest adherence to regulations and rules of the countries in which we operate. Through our involvement in trade associations and direct contact with competent authorities we take a proactive, cooperative and compliant stance to ensure we are following the letter and spirit of the various laws. We are regulated by many agencies and hold our operating units to strictly following anti-trust (non-competitiveness), environmental, safety, labor and transportation laws. Our proactive commitment shows in our cooperation with the United Nations Subcommittee of Experts for the Transportation of Dangerous Goods which develops transportation laws (as manufacturers of industrial packagings certified for dangerous goods we are regulated by transportation agencies). We comply with their requirements and the competent authorities that adopt the regulations often years ahead of schedule. In this way we minimize any exposure to fines and citations for non-compliance. In 2009, MAUSER has not been subject to any legal actions with regard to anti-competitive behavior.

Products meeting the standards

Industrial packaging has to adhere to strict regulations, especially if used for the transport of dangerous goods. We design and develop our packaging according to national and international regulations including DOT or RID/ADR and make sure that the manufacturing of each single packaging is in accordance to the achieved approvals. All dangerous goods packagings are marked with regulatory information regarding the use of the containers for hazardous chemicals. Furthermore we supply technical information on appropriate use of our containers: e.g. every plastic drum produced in the US has a Product Definition Sheet that lists all of the specific information and requirements associated for that container. These sheets are to ensure that the container meets the manufacturing, quality and customer's requirements.

There have been recent changes in regulations with regard to design type testing of composite IBCs (vibration test), labeling of composite IBCs (stacking label) and correct UN-marking of inner receptacles of composite IBCs. Furthermore, in the US there has been issued a modified "refillable pesticide container law" applicable for agrochemical packaging. In Europe, REACH and upcoming review of the EU-Guideline for Food Contact have legislative impact on our products. Special working groups within MAUSER follow the regulations and make sure our products conform to the latest regulations. In addition, we actively inform our customers of changes to ensure they are in a position to use packagings that comply with the most stringent standards. The same is valid for procedures for the use of the products, for instance opening and closing of packaging.

Customer satisfaction

Satisfied customers are of the highest importance for MAUSER. With many of our key customers, we have implemented annual review meetings where we openly discuss our performance in the following categories: quality, on time delivery, employee friendliness, technical competence and support, as well as strategic company positioning. In addition, we compile statistical analysis of incoming supplier ranking sheets to help ensure a continuous improvement in customer satisfaction. While in 2008 our performance as supplier had been ranked by 86% of our customers as "Level A or excellent supplier", for 2009 we could achieve equivalent ranking with 95% of the incoming ranking forms for products/services provided by our German locations.

Complaint management – quality improvement

We use an Intranet based Complaint Management System (CMS) to not only identify "hot spots" that need to be addressed immediately, but also to continuously improve our quality performance. In the global perspective, compared to 2008, our complaints per one thousand deliveries in 2009 decreased within all recorded regions. The details are shown in the table below.

Customer complaints per 1000 deliveries

	MAUSER Group	SBU Europe	SBU NA	SBU SA
2008	4.9	4.6	5.1	6.6
2009	4.4	4.4	4.1	5.1

For 2010 we will be continuously working on further improvement. Customer satisfaction and quality performance are an essential part of our condensed Score Cards to reflect individual plant performances.



► **Lean and Green** – “We started a Lean and Green program for our operations with a pilot for energy reductions. We already listed many opportunities for improvement and start a worldwide roll-out in 2010. At the moment we are collecting and comparing all the energy data of the different production locations worldwide. We try to create several benchmarks like for example the energy used per kg of product. This way we can pinpoint the most relevant improvements. We expect to realize improvements of 15-20% of our energy use.”

Jan Jacobs, Manager Machinery Design

Reporting principles

This report is the first annual sustainability report for MAUSER group. We used the guidelines from the Global Reporting Initiative (GRI-G3), application level B. This first report has not been assured by an external party. We intend to develop the reporting practice to a more extensive GRI level in the coming years.

Scope and boundary of the report

The scope of the report for general and environmental information includes all 100% owned MAUSER and NCG operations. When certain information is available for, or applicable to only part of the MAUSER/NCG activities, this is mentioned in the report. Joint ventures and joint venture partners are mentioned where applicable.

For the financial and the quantitative information on HR, joint ventures where MAUSER holds a majority share are

included fully and joint ventures where MAUSER holds a minority share are left out completely. This scope is the same in the financial report and ensures that the data in both reports is consolidated in the same way and comparable.

Reporting process

A MAUSER/NCG steering team discussed and defined the issues to be reported. The results from the project for development of the sustainability program, for which a stakeholder analysis and stakeholder consultations took place, and the company developments in 2009 were used as general starting points. The contents were collected by the responsible managers for the different issues at Headquarters, assisted by many colleagues in the field.

GRI (version G3) content index

Performance indicators	Status	Location
1. Strategy and analysis		
1.1 Statement from the most senior decision-maker of the organization about the relevance of sustainability to the organization and its strategy	C	Preface (3)
1.2 Description of key impacts, risks, and opportunities	C	Preface (3), Management approach to sustainability (11), sustainable products and services (15-17)
2. Organizational profile		
2.1 Name of the organization	C	Profile (5)
2.2 Primary brands, products, and/or services	C	Profile (5)
2.3 Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	C	Profile (8)
2.4 Location of organization's headquarters	C	Profile (5)
2.5 Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report	C	Profile (5), Compliance (30)
2.6 Nature of ownership and legal form	C	Profile (8)
2.7 Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)	C	Profile (5, 9)
2.8 Scale of the reporting organization	C	Finance (27)
2.9 Significant changes during the reporting period regarding size, structure or ownership	C	Profile (9)
2.10 Awards received in the reporting period	C	People (24)
3. Report parameters		
Report profile		
3.1 Reporting period (e.g., fiscal/calendar year) for information provided	C	Reporting principles (33)
3.2 Date of most recent previous report	NAP	
3.3 Reporting cycle (annual, biennial, etc.)	C	Reporting principles (33)
3.4 Contact point for questions regarding the report or its contents	C	Administration (38)
Report scope and boundary		
3.5 Process for defining report content	C	Reporting principles (33)
3.6/3.7 Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)	C	Reporting principles (33)
3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations	C	Reporting principles (33)
3.9 Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the indicators and other information in the report	NR	
3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement	NAP	
3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report	NAP	
GRI content index		
3.12 Contents	C	GRI contents table (34-37)
Assurance		
3.13 Policy and current practice with regard to seeking external assurance for the report (B)	C	Reporting principles (33)

Performance indicators	Status	Location
4. Governance, commitments and engagement		
Governance		
4.1 Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight	C	Profile (8)
4.2 Indicate whether the Chair of the highest governance body is also an executive officer	C	Profile (8)
4.3 For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members	NAP	
4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	C	Profile (8), People (25)
4.5 Linkage between compensation for members of the highest governance body, senior managers, and executives, and the organization's performance	C	People (24)
4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided	P	Compliance (30)
4.7 Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on CSR topics	P	Profile (8)
4.8 Internally developed statements of mission or values, codes of conduct, and principles relevant to CSR performance and the status of their implementation	C	Compliance (29-30)
4.9 Procedures of the highest governance body for overseeing the organization's identification and management of CSR performance, relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles	C	Profile (9), Compliance (30)
4.10 Processes for evaluating the highest governance body's own performance, particularly with respect to CSR performance	P	Profile (8, 9)
Commitments to external initiatives		
4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organization	C	Management approach sustainability (15-17), Compliance (29-31)
4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or which it endorses	C	Compliance (30)
4.13 Memberships in associations (such as industry associations) and/or national/international advocacy organizations	C	Management approach (13)
Stakeholder engagement		
4.14 List of stakeholder groups engaged by the organization	P	Management approach (13)
4.15 Basis for identification and selection of stakeholders with whom to engage	C	Management approach (13)
4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	C	Management approach (13), Compliance (31)
4.17 Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns	P	Preface (3)

Performance indicators	Status	Location
Disclosures on Management Approach (DMA) (B)		
DMA Economic aspects	C	Preface (3), Profile (5), Finance (27)
DMA Environmental aspects	C	Management approach (11-12), Sustainable products and services (15), Environmental management (19)
DMA Labor practices and decent work	C	People (23)
DMA Human rights	C	Compliance (29)
DMA Society	C	Compliance (29)
DMA Product responsibility	C	Sustainable products and services (15), Compliance (31)
Economic performance indicators		
EC1 Economic value generated and distributed	C	Finance (27)
EC4 Significant financial assistance received from government	NAP	
EC5 Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation	P	People (24)
Environmental performance indicators		
EN1 Materials used by weight or volume	C	Environment (21)
EN3 Direct energy consumption by primary energy source (2)	C	Environment (20)
EN4 Indirect energy consumption by primary source (3)	C	Environment (20)
EN5 Energy saved due to conservation and efficiency improvements	P	Environment (20)
EN6 Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives	P	Sustainable products and services (15-17), Environment (19, 20)
EN7 Initiatives to reduce indirect energy consumption and reductions achieved	P	Sustainable products and services (15-17), Environment (19, 20)
EN8 Total water withdrawal by source	C	Environment (20)
EN9 Water sources significantly affected by withdrawal of water	P	Environment (21)
EN10 Percentage and total volume of water recycled and reused	P	Environment (21)
EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	C	Sustainable products and services (15-17)
EN28 Monetary value of significant fines and total number of non-compliance with environmental laws and regulations	P	Compliance (30)
Social performance indicators: labor practices and decent work		
LA1 Total workforce by employment type, employment contract, and region	C	People (23)
LA2 Total number and rate of employee turnover by age group, gender, and region	P	People (23)
LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations	P	People (24)
LA4 Percentage of employees covered by collective bargaining agreements	P	People (24)
LA6 Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	C	People (24)
LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region	P	People (24)
LA9 Health and safety topics covered in formal agreements with trade unions	P	People (24)
LA12 Percentage of employees receiving regular performance and career development reviews	C	People (24)

Performance indicators	Status	Location
Social performance indicators: human rights		
HR1 Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening	P	Compliance (29)
HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	P	Compliance (30)
HR4 Total number of incidents of discrimination and actions taken.	C	People (25)
HR5/HR6/HR7 Operations identified as having significant risk for incidents of (1) not exercising freedom of association and collective bargaining, (2) child labor, (3) forced or compulsory labor; and measures taken to contribute to the elimination of the incidents	P	Compliance (30)
HR9 Total number of incidents of violations involving rights of indigenous people and actions taken	P	People (25), Compliance (30)
Social performance indicators: society		
SO1 Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting	P	Compliance (29)
SO2 Percentage and total number of business units analyzed for risks related to corruption	C	Compliance (30)
SO3 Percentage of employees trained in organization's anti-corruption policies and procedures	P	Compliance (30)
SO5 Public policy positions and participation in public policy development and lobbying	C	Profile (13)
Social performance indicators: product responsibility		
PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures	C	Compliance (31)
PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	C	Compliance (31)
PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	P	Compliance (31)

Content index: C = Completely reported; P = Partially reported; NAP = Not Applicable

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