



United Nations
Global Compact

We thank you for your time spent taking this survey.
Your response has been recorded.

CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that Industria e Comercio Gráfica Conselheiro LTDA reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

C1. Please complete the following information:

CEO/Highest-level executive name:	Sidney Anversa Victor
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CEO/Highest-level executive full title:	Presidente
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Company name:	Congraf Embalagens
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C2. Please confirm:

- ☐ I am the CEO or highest-level executive.
- ☒ **I have received permission to sign on behalf of the CEO or highest-level executive.**

C2.1. If applicable, form completed on behalf of the CEO or highest-level executive by:

DOUGLAS MARIANO MARCAL

R1. How will you complete the CoP reporting requirement?

(Select one)

- ☒ **Complete the digital questionnaire with the option to also add a sustainability report (*Recommended*)**
- ☐ Only upload a sustainability report

R2. What is the time period covered by your Communication on Progress? (MM/YYYY - MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select. [i](#)

01/2025 - 12/2025

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed.i

Success Stories & Future Priorities

Sl. (Optional) Within the reporting period, is there an initiative(s), project(s), and/or policy(ies) of which the company is particularly proud? Please focus on examples that demonstrate not only positive societal or environmental impact but also measurable value for the company.

Disclaimer: These initiatives are self-reported and have not been independently verified by the UN Global Compact. By

responding to this question, you consent to being contacted by the UN Global Compact regarding these initiatives for potential inclusion as examples in UN Global Compact resources.

This stand-out effort relates to:

(Select all that apply) 

☒ **Governance**

☐ Human Rights

☐ Labour

☒ **Environment**

☐ Anti-Corruption

S1A. Please provide a link and/or provide additional information:

Congraf Embalagens formalizes its ESG commitment through the "Corporate Environmental Policy (DC-20.02)" and the "Strategic Ambitions and Commitments for 2030," which structure our governance and guide our decarbonization goals and sustainable resource management. Performance Management: We operate with systematic performance indicators (Water, Energy, and Waste Intensity), ensuring that operational performance is audited and maintained within annual targets. Transparency: All I-REC retirement records and FSC Chain of Custody certificates are available for verification through our institutional platform and reporting portals (EcoVadis/Sedex).

(Optional) Please upload an outcome-focused document:

F-20.03 – Intensidade de Resíduo Sólido Classe 2 (Inerte) por Funcionário (2025).pdf

0.5 MB

application/pdf

S2. Which of the five issue areas does the company plan to prioritize in the next two years?

(Select all that apply) 

☒ **Governance**

☐ Human Rights

☒ **Labour**

☒ **Environment**

☐ Anti-Corruption

☐ None

S2A. (Optional) Please provide additional information:

Over the next two years, Congraf will prioritize the consolidation of its Ambition 2030 and its new Environmental Policy. In the Environment pillar, the focus will be on maintaining and expanding the FSC chain of custody and advancing decarbonization through renewable energy (I-REC). In Governance, we will enhance our corporate risk matrices to ensure the longevity of sustainability actions within our business model. In the Labour pillar, we will strive for continuous excellence in the working conditions of our manufacturing plant, with a short-term goal of achieving a green score of over 85% in the renewal of our WCA audit.

Governance

[Click for additional guidance](#)

G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply) 

- ☐ Issue an annual statement about the relevance of sustainable development to the company
- ☐ Issue an annual statement that addresses impacts on both people and the environment
- ☐ Issue an annual statement highlighting a zero tolerance for corruption
- ☒ **Sign off on organizational sustainability targets**
- ☒ **Supervise Environmental, Social, and Governance reporting**
- ☒ **Regularly review potential risks related to the business model**
- ☐ None of the above

G1A. (Optional) Please provide additional information:

Congraf's senior management is directly involved in the approval and strategic supervision of our ESG targets, including the "Ambition 2030" plan and the new corporate Environmental Policy. In addition to validating sustainability indicators, the board systematically reviews our organizational Risk Matrix. This analysis is conducted rigorously, evaluating risks to the business model through the multiplication of Probability x Impact, with measurements defined as High (5), Medium (3), and Low (1). This analytical approach by senior management ensures that sustainable development and risk mitigation remain central and enduring pillars in the company's decision-making process.

G2. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on our employees	Yes, focused on our employees and suppliers	Yes, focused on our employees and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	☐	☐	☒	☐	☐
Labour Rights/Decent Work	☐	☐	☒	☐	☐
Environment	☐	☐	☐	☒	☐
Anti-Corruption	☐	☐	☒	☐	☐

G2A. (Optional) Please provide additional information:

Congraf's conduct and policies are structured with a focus on auditable evidence. In the Environmental sphere, our guidelines cover both our internal operations and our suppliers through the rigorous chain of custody control of the FSC certification. Regarding Human and Labour Rights, our code of conduct currently prioritizes our employees, ensuring health, safety, and decent work across all our printing production shifts. These internal practices are externally validated through tools such as the WCA (Workplace Conditions Assessment) audit.

G3. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer option per line) i

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	☐	☐	☒	☐	☐
Labour Rights/Decent Work	☐	☐	☐	☒	☐
Environment	☐	☐	☐	☒	☐
Anti-Corruption	☐	☒	☐	☐	☐

G3A. (Optional) Please provide additional information:

At Congraf, responsibilities for the sustainability pillars are distributed in a clear and functional manner. The Environment pillar is directly led by the Quality Management System (QMS) and ESG Department, which has the technical autonomy and reports directly to the Board of Directors to implement operational improvements, such as the FSC chain of custody and clean energy tracking (I-REC). Human Rights and Labour issues are managed by the Human Resources department in coordination with the QMS, ensuring social compliance validated by third-party audits (WCA). The Anti-Corruption area is corporately supervised by the company's administrative and financial boards.

G3.1. If yes, does the company also have formal governance structures (e.g., committees or governance bodies) in place to provide strategic oversight and support for these sustainability topics?

(Select one answer option per line) 

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	☐	☐	☒	☐	☐
Labour Rights / Decent Work	☐	☐	☒	☐	☐
Environment	☐	☐	☐	☒	☐
Anti-Corruption	☒	☐	☐	☐	☐

G3.1A (Optional) Please provide additional information:

At Congraf, responsibilities for the sustainability pillars are distributed in a clear and functional manner. The Environment pillar is directly led by the Quality Management System (QMS) and ESG Department, which has the technical autonomy and reports directly to the Board of Directors to implement operational improvements, such as the FSC chain of custody and clean energy tracking (I-REC). Human Rights and Labour issues are managed by the Human Resources department in coordination with the QMS, ensuring social compliance validated by third-party audits (WCA). The Anti-Corruption area is corporately supervised by the company's administrative and financial boards.

G4. Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks	☐	☐	☐	☒	☐	☐
Labour rights risks	☐	☐	☐	☒	☐	☐
Environmental risks	☐	☐	☐	☒	☐	☐
Corruption risks	☐	☐	☒	☐	☐	☐

G4A. (Optional) Please provide additional information:

G5. Does the company have a due diligence process through which it identifies, prevents, mitigates and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	☐	☐	☒	☐	☐
Labour rights risks	☐	☐	☒	☐	☐
Environmental risks	☐	☐	☐	☒	☐
Corruption risks	☐	☒	☐	☐	☐

G5A. (Optional) Please provide additional information:

Our due diligence processes operate integrated with the Quality Management System and third-party audits. For environmental aspects, we extend the assessment to direct suppliers through the FSC chain of custody certification. For labor and human rights, assessments are focused on our own manufacturing operations, being verified and ensured by external programs such as the WCA audit.

G5.1. During the due diligence process, has the company identified those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

(Select one answer option per line) 

	Yes	No
Environmental risks	☒	☐

G5.1A. (Optional) Please provide additional information:

Yes, we have identified that the paper and cardboard supply chain presents inherent environmental risks related to the origin of the raw material. As a control and mitigation measure, we require strict monitoring through the FSC chain of custody certification from our suppliers.

G6. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human Rights	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☒
Environment	☐	☐	☐	☒
Anti-Corruption	☐	☒	☐	☐

G6A. (Optional) Please provide additional information:

Currently, Congraf maintains internal communication channels managed by HR to address labor, human rights, and environmental issues. As part of our ongoing commitment to governance and ethics, we have already contracted the independent and anonymous platform "WWW.ContatoSeguro.COM" to serve as our official corporate whistleblowing channel, which will also cover the Anti-Corruption pillar. The tool is in the final implementation phase and will be fully operational in the short term.

G6.1. Please provide additional detail regarding the process(es) the company has through which members of the company’s workforce can raise concerns about the company’s conduct.

(Select one answer option per line)i

Yes

No

Is the process communicated to all employees/workers in local languages?

☒☐

Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?

☐☒

Is the process confidential (e.g., whistleblowing process)?

☒☐

Are there processes in place to ensure the protection of whistleblowers? (e.g., against retaliation)

☒☐

Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?

☒☐

Other (Please provide additional information)

☐☒

G6.1A. (Optional) Please provide additional information:

Communication channels are widely disclosed to all employees in the local language (Portuguese). Confidentiality and strict protection against any form of retaliation are guaranteed by our current guidelines and will be independently reinforced with the final implementation of the third-party platform "Contato Seguro". In addition to internal matters, our employees are encouraged to report ethical or operational deviations involving our supply chain and business partners.

G7. How does the company track the effectiveness of its actions to manage its potential and actual impacts on the following sustainability topics?

(Select all that apply for each line) 

	No actions are systematically tracked	Gathers and assesses feedback from relevant stakeholders	Sets and regularly tracks goals and targets/KPIs	Conducts monitoring and evaluation (e.g. through internal and/or external auditing, impact assessments, grievance mechanisms, and benchmarking)	Incorporates lessons learned into operational policies and procedures
Human Rights	☐	☐	☒	☒	☒
Labour Rights/Decent Work	☐	☐	☒	☒	☒
Environment	☐	☐	☒	☒	☒
Anti-Corruption	☐	☐	☒	☒	☐

G7A. (Optional) Please provide additional information:

G8. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer option per line) i

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	☒	☐	☐
Labour Rights / Decent Work	☒	☐	☐
Environment	☒	☐	☐
Anti-Corruption	☒	☐	☐

G8A. (Optional) Please provide additional information:

G9. Please provide details regarding the company's board/highest governance body.ⁱ

(Please enter only whole numbers rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros. For the categories 'Male, Female, Other', 'Under 30 years old, 30–50 years old, Above 50 years old', and 'Executive directors or equivalent, Non-executive directors or equivalent, and Independent non-executive directors or equivalent', please enter whole numbers only from 0 to 100). The values within these categories must total 100% in order to proceed.)

If your organization does not have board directors, select the options which best represent the members of your equivalent governing body with respect to their involvement in the day-to-day management of your organization.

	Known	Number (Please input a whole number)	Not applicable
Total number of board members (#)	☒	2	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Male (%)	☒	100	☐
Female (%)	☒	0	☐
Other (%)	☒	0	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Under 30 years old (%)	☒	0	☐
30-50 years old (%)	☒	50	☐
Above 50 years old (%)	☒	50	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
From minority or vulnerable groups (%)	☐		☒

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Executive directors or equivalent (%)	☒	100	☐
Non-executive directors or equivalent (%)	☒	0	☐
Independent non-executive directors or equivalent (%)	☒	0	☐

G9A. (Optional) Please provide additional information:

At Congraf, our highest governance body is the Executive Board, composed of the Presidency and Area Directors. This group is directly responsible for overseeing corporate strategy, manufacturing operations, and validating the indicators of our Quality Management System (QMS) and ESG.

G10. Within the reporting period, what was the percentage of women in managerial positions?

(If 'Known' is selected, include the value. Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)[i](#)

	Known	Percentage of women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial positions	☒	20	☐

G10A. (Optional) Please provide additional information:

G11. What is the gender representation of the company's C-suite or equivalent executive leadership positions?

(Select all that apply for each line) 

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer	☐	☒	☐	☐	☐
Chief Financial Officer	☒	☐	☐	☐	☐
Chief Procurement Officer	☐	☐	☐	☒	☐
Chief Technology Officer	☐	☒	☐	☐	☐
Chief Marketing Officer	☐	☐	☐	☒	☐
Chief Operations Officer	☒	☐	☐	☐	☐
Chief Sustainability Officer	☐	☒	☐	☐	☐
Chief Legal Officer/General Counsel	☐	☒	☐	☐	☐
Chief Human Resources Officer	☒	☐	☐	☐	☐
Chief Compliance Officer	☐	☒	☐	☐	☐
Other (Please provide additional information)	☐	☐	☐	☒	☐

G11A. (Optional) Please provide additional information:

G12. Does the company consider sustainability in its financing and investment strategies?

(Select one that applies) i

- ☒ **Yes, we consider sustainability in our financial planning and decision-making, but not through a structured approach**

Yes, we take a structured approach to considering sustainability **through a sustainability-informed investment or financing strategy, but this does not include specific targets tied to sustainability impact** (e.g., sustainability-linked bonds)

- ☐

Yes, we take a structured approach to considering sustainability in financing and investment **through SDG-aligned investment or SDG-linked financing strategies**, including specific targets tied to sustainability impact (e.g., use-of-proceeds bonds)

- ☐

☐ No, but we plan to within the next two years

☐ No, this is not a current priority

☐ Choose not to disclose

G12A. (Optional) Please provide additional information:

At Congraf, investments in sustainability, such as the acquisition of renewable energy certificates (I-REC) and the maintenance of audits (FSC and WCA), are a direct part of our financial and operational planning. Although we do not use complex market financial instruments linked to ESG targets, the board's corporate budget actively supports and prioritizes our environmental and quality actions.

G13. Does the company produce sustainability reporting according to:

(Select all that apply) 

- ☐ National/local regulation on sustainability
- ☐ Security exchange regulations
- ☐ Corporate Sustainability Reporting Directive (CSRD) (formerly known as Non-Financial Reporting Directive of the European Union (NRFD))
- ☐ Voluntary Sustainability Reporting Standards for non-listed SMEs (VSME)
- ☐ Global Reporting Initiative (GRI)
- ☐ Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
- ☐ International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
- ☐ Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
- ☐ IFRS Sustainability Disclosure Standards (IFRS S1 and S2) (incorporating the Task Force on Climate-related Financial Disclosures (TCFD))
- ☐ Taskforce on Nature-related Financial Disclosures (TNFD)
- ☐ Taskforce on Inequality and Social-related Financial Disclosures (TISFD)
- ☐ CDP (formerly known as Carbon Disclosure Project)
- ☐ Science-Based Targets initiative (SBTi)
- ☐ Other voluntary frameworks (Please provide additional information)
- ☒ **No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress**

G13A. (Optional) Please provide additional information:

Currently, the Global Compact Communication on Progress (COP) serves as our primary public sustainability report. Our socio-environmental and ethical performance data is managed by the QMS and practically validated through globally recognized sustainability rating platforms, such as EcoVadis and Sedex, in addition to the rigorous WCA (Workplace Conditions Assessment) social responsibility audit.

G14. Is some or all of the information disclosed in this questionnaire assured by a third-party?

(Select one that applies) i

☐ Yes

☒ **No**

G14A. (Optional) Please provide additional information:

Although this questionnaire itself does not undergo a formal consolidated assurance by an external consultancy, the operational information and indicators disclosed herein are strictly managed by our Quality Management System (QMS). The veracity of our data is practically validated through globally recognized sustainability rating platforms, such as EcoVadis and Sedex, in addition to the compliance results of our WCA social responsibility audit.

Human Rights and Labour

[Click for additional guidance](#)

NOTE: Regardless of whether the labour rights topics (freedom of association and the right to collective bargaining, child labour, forced labour, non-discrimination and equality, a safe and healthy working environment and wages) and the gender topic (gender equality and women's rights) are selected as material in questions HR/L1, all UN Global Compact participants must provide additional details on these topics in subsequent HR/L questions. For all other human rights and labour rights topics listed in question HR/L1, these topics will only be prompted in subsequent HR/L questions if they are selected as material in question HR/L1.1.

HR/LI. Which of the following has the company identified (by way of a formal or informal assessment) as material human rights and labour rights topics connected with its operations and/or value chain?

Note: It is important that participants assess the topics below, especially areas such as digital security, privacy, and data protection through a human rights and labour rights lens rather than an operational risk management lens.

(Select all that apply) 

- ☐ Freedom of association and the right to collective bargaining
- ☒ **Child labour**
- ☒ **Forced labour**
- ☒ **Non-discrimination and equality (in respect of employment and occupation)**
- ☒ **Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)**
- ☒ **Wages**
- ☒ **Working hours**
- ☐ Mental health and employee wellbeing
- ☒ **Gender equality and women's rights**
- ☐ Children's rights (beyond child labour)
- ☐ Rights of vulnerable groups (e.g., migrants, refugees, minority communities)
- ☐ Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)
- ☐ Just Transition (human rights impacts of climate action and economic transition on workers and communities)
- ☐ Land rights and rights of Indigenous Peoples
- ☒ **Raw material sourcing (incl. traceability)**
- ☐ Digital security, privacy, and data protection
- ☐ Freedom of expression and access to information

- ☐ Product and service end-user rights (incl. safety, accessibility, and potential misuse)
- ☐ Emerging technologies and responsible adoption of Artificial Intelligence (AI)
- ☐ Conflict-sensitive due diligence and/or use of security providers
- ☐ Other human/labour rights topics identified as material
- ☐ No informal or formal human/labour rights assessment conducted

HR/LIA. (Optional) Please provide additional information:

Os tópicos materiais selecionados refletem os riscos avaliados e monitorados continuamente pelo nosso Sistema de Gestão da Qualidade (SGQ) em conjunto com o departamento de Recursos Humanos. As questões trabalhistas, de saúde, segurança e direitos humanos são validadas na prática pela rigorosa auditoria de conformidade social WCA. Simultaneamente, a rastreabilidade de nossa cadeia de suprimentos e o direito a um meio ambiente sustentável são assegurados pelas nossas políticas internas e pela certificação de cadeia de custódia FSC.

HR/L1.1. In addition to the required labour rights topics (freedom of association and the right to collective bargaining, child labour, forced labour, non-discrimination and equality, a safe and healthy working environment, and wages) and the gender topic (gender equality and women's rights), which human rights and labour rights topics does the company identify as most material to be reported on when answering questions HR/L2–HR/L5?

(Select all that apply, maximum six) i

☒ **Working hours**

- ☐ Mental health and employee wellbeing
- ☐ Children's rights (beyond child labour)
- ☐ Rights of vulnerable groups (e.g., migrants, refugees, minority communities)

☒ **Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)**

- ☐ Just Transition (human rights impacts of climate action and economic transition on workers and communities)
- ☐ Land rights and rights of Indigenous Peoples

☒ **Raw material sourcing (incl. traceability)**

- ☐ Digital security, privacy, and data protection
- ☐ Freedom of expression and access to information
- ☐ Product and service end-user rights (incl. safety, accessibility, and potential misuse)
- ☐ Emerging technologies and responsible adoption of Artificial Intelligence (AI)
- ☐ Conflict-sensitive due diligence and/or use of security providers
- ☐ None

HR/LI.1A. (Optional) Please provide additional information:

HR/L2. Does the company have a policy commitment in relation to the following human rights & labour rights topics?

(Select one answer option per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☐	☒	☐
Child labour	☐	☐	☒	☐
Forced labour	☐	☐	☒	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐
Wages	☐	☐	☒	☐
Gender equality and women's rights	☐	☐	☒	☐
Working hours	☐	☐	☒	☐
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	☐	☐	☒	☐
Raw material sourcing (incl. traceability)	☐	☐	☒	☐

Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)

Freedom of association and the right to collective bargaining	2026
Child labour	2026
Forced labour	2026
Non-discrimination and equality (in respect of employment and occupation)	2026
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	2026
Wages	2026
Gender equality and women's rights	2026
Working hours	2026
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	2026
Raw material sourcing (incl. traceability)	2026

HR/L2A. (Optional) Please provide additional information:

Congraf's commitments are formalized in our Quality Management System (QMS) manuals, internal Code of Conduct, and our recent corporate Environmental Policy. Human rights, labor, health, and traceability topics are systematically documented and reviewed to ensure full compliance with our corporate sustainability and ethics guidelines.

HR/L2A. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

DC-20.02 Política Ambiental Corporativa e Compromissos ESG - CONGRAF EMBALAGENS (REV.03).pdf

8.1 MB

application/pdf

HR/L2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

DC-14.11 DECLARAÇÃO DE CONDUTA ÉTICA E ANTICORRUPÇÃO CONGRAF EMBALAGENS.pdf

7.2 MB

application/pdf

HR/L2.1. For each human rights & labour rights policy commitment, is it:

(Select all that apply for each line) 

Freedom of association and the right to collective bargaining	
☒ Aligned with international human rights/labour standards	
☒ Publicly available	
☒ Approved at most senior level of the company	
☒ Applied to the company's own operations	
☒ Applied to the company's suppliers	
☐ Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)	
☒ Developed involving human rights/labour expertise from inside and/or outside the company	
☒ Other (Please provide additional information)	
Child labour	
Forced labour	
Non-discrimination and equality (in respect of employment and occupation)	
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	
Wages	

Gender equality and women's rights	▼
Working hours	▼
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	▼
Raw material sourcing (incl. traceability)	▼

HR/L2.1A. Other (Please provide additional information):

Raw material sourcing at Congraf Embalagens is strictly controlled by our Quality Management System (QMS) and FSC certification, ensuring an ethical, traceable, and sustainable chain of custody for our paper and cartonboard. Our sourcing policies are approved by Top Management, integrated into the Purchasing and Receiving processes across our three shifts, and serve as mandatory requirements for supplier qualification, ensuring full compliance with labor and human rights standards throughout the value chain.

HR/L2.1A. (Optional) Please provide additional information:

HR/L2.2. Does the company’s policy on freedom of association and collective bargaining:

(Select all that apply) i

- ☒ **Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of anti-union discrimination**
- ☒ **Prohibit any acts of interference in trade unions**
- ☐ Facilitate collective bargaining with the trade union representatives
- ☐ Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations
- ☐ Reference the respect for the right of workers to submit grievances without suffering
- ☐ We do have a policy on freedom of association or collective bargaining but it does not include any of these details

HR/L2.2A. (Optional) Please provide additional information:

HR/L2.3. Does the company's policy on wages include:

(Select all that apply) 

Note: The International Labour Organization (ILO) defines living wage as “the wage level that is necessary to afford a decent standard of living for workers and their families, taking into account the country circumstances and calculated for the work performed during the normal hours of work.” Compliance with minimum wage laws alone does not constitute a living wage commitment unless explicitly aligned with recognised living wage benchmarks.

☒ **A commitment to equal pay for work of equal value**

- ☐ A commitment to paying living wages to the company's own employees
- ☐ A commitment to advancing the payment of living wages across the company's supply chain
- ☐ A commitment to measuring and monitoring progress toward paying living wages (e.g., through living wage gap analyses)
- ☐ Time-bound, measurable targets to advance the payment of living wages
- ☐ We do have a policy on wages, but it does not include any of these details (Please provide additional information)

HR/L2.3A. (Optional) Please provide additional information:

Congraf Embalagens guarantees equal pay for equivalent roles without any distinction, in compliance with the Brazilian Labor Laws (CLT) and current national equal pay legislation. Our wages are regulated by the collective bargaining agreements of the printing industry sector, ensuring fair and competitive remuneration for our approximately 170 employees across all three working shifts.

HR/L3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights & labour rights topics?

(Select all that apply for each line) 

	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question
Freedom of association and the right to collective bargaining	☐	☒	☒	☒
Child labour	☐	☒	☒	☐
Forced labour	☐	☒	☒	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☒	☒	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☒	☒	☒
Wages	☒	☐	☐	☐
Gender equality and women's rights	☒	☐	☐	☐
Working hours	☒	☐	☐	☐
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	☐	☒	☒	☒
Raw material sourcing (incl. traceability)	☐	☒	☒	☐

	No engagement on this topic	To better understand / mitigating the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question
Freedom of association and the right to collective bargaining		☒		☐
Child labour		☒		☐
Forced labour		☒		☐
Non-discrimination and equality (in respect of employment and occupation)		☒		☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)		☒		☐
Wages		☐		☐
Gender equality and women's rights		☐		☐
Working hours		☐		☐
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)		☒		☐
Raw material sourcing (incl. traceability)		☒		☐

HR/L3A. (Optional) Please provide additional information:

Congraf Embalagens maintains active communication and engagement channels with its employees through Human Resources, the internal accident prevention commission (CIPA), and shift leaders to ensure a safe, equal, and healthy environment. Externally,

HR/L4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select all that apply for each line) 

Freedom of association and the right to collective bargaining	
☐ No action within reporting period	
☒ Provided internal training/ capacity building for the direct workforce	
☐ Built capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	
☒ Conducted an audit process and/or corrective action plan	
☐ Collective action with peers or other stakeholders to address the issue	
☐ Collaborated with governmental or regulatory bodies	
☐ Other (Please provide additional information)	
Child labour	
Forced labour	
Non-discrimination and equality (in respect of employment and occupation)	
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	
Wages	

Gender equality and women's rights	▼
Working hours	▼
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	▼
Raw material sourcing (incl. traceability)	▼

HR/L4A. (Optional) Please provide additional information:

Congraf Embalagens enforces strict operational controls, including frequent onboarding, safety, and best practice training for all three production shifts. Our purchasing and receiving processes ensure raw material traceability through FSC certification. Furthermore, we regularly undergo social responsibility audits such as the WCA, which validate the integrity of our working hours, occupational health, and employee rights controls.

HR/L4.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☐	☒	☐	☐
Child labour	☐	☐	☒	☐	☐
Forced labour	☐	☐	☒	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐	☐
Wages	☐	☐	☒	☐	☐
Gender equality and women's rights	☐	☐	☒	☐	☐
Working hours	☐	☐	☒	☐	☐

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	☐	☐	☒	☐	☐
Raw material sourcing (incl. traceability)	☐	☐	☒	☐	☐

HR/L4.1A. (Optional) Please provide additional information:

HR/L4.1.1. (Optional) For relevant human rights & labourrights topics for which the company sets timebound goals/targets, what targets has the company set? i

Freedom of association and the right to collective bargaining

Maintain 100% compliance with printing sector collective agreements annually.

Child labour

Maintain 0 cases in our operations and ensure 100% of critical suppliers are qualified by 2026.

Forced labour

Maintain 0 cases and ensure 100% of critical suppliers are qualified and monitored by 2026

Non-discrimination and equality (in respect of employment and occupation)

Achieve 100% workforce trained on the Code of Ethics and maintain 0 incidents annually.

Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)

Maintain 100% compliance with GMP and regulatory standards across all 3 shifts, and achieve a WCA audit score >85% by September 2026.

Wages

Guarantee 100% compliance with the collective bargaining baseline for all employees across the 3 shifts annually

Gender equality and women's rights

Maintain 100% compliance with the Brazilian Equal Pay Law and promote leadership diversity targets by 2030.

Working hours	Ensure minimum 90% compliance with legal working hours and rest periods, verified by the upcoming 2026 WCA audit.
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	Maintain 100% renewable energy coverage (I-REC) and continuously improve ISO 14001 environmental indicators by 2026.
Raw material sourcing (incl. traceability)	Maintain 100% FSC certification for all paper and cartonboard purchases annually.

HR/L4.1.1A. (Optional) Please provide additional information:

All targets are continuously monitored by our Quality Management System (QMS) and Human Resources. Our timebound goals are aligned with our 2030 ESG ambitions, ISO 14001, FSC requirements, and our commitment to achieving top-tier results in third-party social responsibility audits, such as the WCA.

HR/L5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights & labour rights topic(s) ?

(Select one answer per line) **i**

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☒	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☒	☐	☐	☐
Wages	☒	☐	☐	☐
Gender equality and women's rights	☒	☐	☐	☐
Working hours	☐	☒	☐	☐
Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)	☒	☐	☐	☐

Raw material
sourcing (incl.
traceability)

No adverse
impact
identified or
caused

Yes, adverse
impact(s)
identified, but no
remedy
provided/enabled

Yes, adverse
impact(s)
identified, and
remedy
provided/enabled

☐ Choose not to
disclose

HR/L5A. (Optional) Please provide additional information:

HR/L6. What was the average gender pay gap (comparing jobs of equal value) during the reporting period? [i](#)

(Please enter only whole numbers, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, spaces, or leading zeros)

Guidance for Gender Pay Gap: Companies should calculate the gender pay gap by subtracting the average hourly earnings of male employees by the average gross hourly earnings of female employees, dividing the resulting figure by average gross hourly earnings of male employees. Earnings should be based on jobs of equal value. The result should then be multiplied by 100 to reveal the percentage wage gap between female and male employees. Please refer to the CoP guidebook for additional information on the gender pay gap formula.

Average Gender Pay
Gap (%) - (Please

☐ input answer as a
whole number e.g., 95%
= 95)

☒ **Unknown**

☐ Choose to not disclose

HR/L6A. (Optional) Please provide additional information:

Congraf Embalagens guarantees equal pay for equivalent roles, in strict compliance with the Brazilian Labor Code (CLT) and the recent National Equal Pay Law (Law No. 14,611/2023). Our wage baselines strictly follow the printing sector's collective bargaining agreement. However, the exact statistical calculation of the average global gender pay gap, according to the methodology required in this report, is currently being structured by our Human Resources and QMS departments, with the goal of being reported in future cycles.

HR/L7. Within the reporting period, what was the rate of recordable work-related accidents for employees? ⓘ

Guidance for work-related accidents rate: companies should calculate the work-related accidents rate by dividing the total number of work-related accidents in the reporting year by the total number of hours worked by all employees during the same period. The result should then be multiplied by 200,000. Please refer to the CoP guidebook for additional information on the work-related accidents rate formula.

Rate of work-related accidents (Please input

- ☐ a number rounded to two decimal places, e.g., 1.55)
- ☒ **Unknown**
- ☐ Choose to not disclose

HR/L7A. (Optional) Please provide additional information:

Congraf Embalagens strictly monitors the health and safety of its employees through our specialized occupational health team (SESMT) and internal commission (CIPA), fully complying with Brazilian Regulatory Standards (NRs). Our accident frequency rate is tracked internally using national statistical standards (NBR 14280). However, our QMS is currently in the process of converting and aligning our occupational health KPIs to the global calculation methodology (200,000 hours factor) required by this report, aiming for full integration in upcoming cycles.

HR/L8. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights and labour principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.i

Environment

[Click for additional guidance](#)

EI. Does the company have a policy commitment in relation to the following environmental topics?

(Select one answer per line, if 'Yes', include the value)i

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (
Climate change	☐	☐	☒	☐	2026
Water	☐	☐	☒	☐	2026
Oceans	☐	☐	☐	☒	
Nature and biodiversity	☐	☐	☒	☐	2026
Air pollution	☐	☐	☒	☐	2026
Waste management	☐	☐	☒	☐	2026
Circularity	☐	☐	☒	☐	2026
Energy & resource use	☐	☐	☒	☐	2026
Other environmental topic(s) (Please provide additional information)	☒	☐	☐	☐	

E1A. Not applicable (Please provide additional information):

The "Oceans" topic was marked as not applicable because our offset printing plant is located inland, and all our effluents are strictly treated and disposed of according to local environmental agency (CETESB) regulations, with no impact on coastal areas.

E1A. (Optional) Please provide additional information:

Congraf Embalagens recently reviewed its Environmental Policy and established its ESG 2030 ambitions. Our commitments to climate change, clean energy use (I-REC), strict chemical and solid waste management, circularity, and biodiversity (FSC) are integrated into our Quality Management System (QMS) and aligned with ISO 14001 guidelines.

E1A. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

DC-20.02 Política Ambiental Corporativa e Compromissos ESG - CONGRAF EMBALAGENS (REV.03).pdf

8.1 MB

application/pdf

EIA. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Ambições e Compromissos Estratégicos para 2030 – Eixo Ambiental – CONGRAF (final2).pdf

0.5 MB

application/pdf

E1.1. For each environmental policy commitment, is it:

(Select all that apply for each line) 

Climate change	▼
Water	▼
Nature and biodiversity	▼
Air pollution	▼
Waste management	▼
Circularity	▼
Energy & resource use	▼

E1.1A. (Optional) Please provide additional information:

Our environmental commitments are driven by senior management and supported by recognized standards tailored to our operations. We hold FSC certification to ensure responsible sourcing, directly supporting nature, biodiversity, and circularity within our packaging supply chain. Regarding energy and resource use, we have secured the I-REC certification for 2025 to guarantee renewable energy consumption. Furthermore, our waste management, water usage, and air emissions strictly adhere to rigorous Brazilian environmental legislation—including CADRI approvals for controlled waste disposal—ensuring safe and responsible manufacturing processes.

E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select all that apply for each line) **i**

Climate change	▼
Water	▼
Oceans	▼
Nature and biodiversity	▼
Air pollution	▼
Waste management	▼
Circularity	▼
Energy & resource use	▼
Other environmental topic (s)	▼

E2A. Other environmental topic(s) (Please provide additional information):

O nosso engajamento com as partes interessadas — incluindo órgãos reguladores, fornecedores e agências de certificação — é essencial para gerir os nossos impactos ambientais. Para a natureza, biodiversidade e circularidade, colaboramos ativamente com a nossa cadeia de suprimentos e auditores independentes através da nossa certificação FSC. Relativamente ao uso de energia e recursos, colaboramos com certificadores para alcançar os nossos objetivos de energia renovável com o I-REC 2025. Além disso, mantemos um diálogo contínuo e transparente com as autoridades ambientais e parceiros especializados em gestão de resíduos para avaliar o progresso e garantir a conformidade rigorosa com a legislação brasileira, incluindo os requisitos do CADRI para a destinação de resíduos.

E2A. Other (Please provide additional information):

Not be information

E2A. (Optional) Please provide additional information:

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply) **i**

Climate change	▼
Water	▼
Oceans	▼
Nature and biodiversity	▼
Air pollution	▼
Waste management	▼
Circularity	▼
Energy & resource use	▼
Other environmental topic(s)	▼

E3A. (Optional) Please provide additional information:

E3.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select one answer option per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change	☐	☒	☐	☐	☐
Water	☐	☐	☒	☐	☐
Nature and biodiversity	☒	☐	☐	☐	☐
Air pollution	☐	☐	☒	☐	☐
Waste management	☐	☐	☒	☐	☐
Circularity	☐	☐	☒	☐	☐
Energy & resource use	☐	☐	☒	☐	☐

E3.1A. (Optional) Please provide additional information:

E3.1.1. (Optional) For relevant environmental topics for which the company sets timebound goals/targets, what targets has the company set?

(Please provide a description of targets, for example, what is the target, absolute vs. intensity, externally verified, on track, etc. Refer to the CoP Guidebook for target examples) 

Water	Maintain 100% legal compliance and internally monitor intensity metrics to optimize industrial consumption. (Internal target, tracked annually).
Air pollution	Ensure 100% compliance with Brazilian emission regulations to maintain our operation licenses.
Waste management	Manter 100% da destinação de resíduos controlada via CADRI
Circularity	Maintain our FSC certification requirements to ensure responsible sourcing and optimize paper/board waste during the production process. (Externally verified).
Energy & resource use	Obtain the I-REC certification by 2025 to formally verify and guarantee our renewable energy consumption goals. (Timebound, externally verified).

E3.1.1A. (Optional) Please provide additional information:

E3.1.2. For each environmental topic in which the company sets timebound goals/targets, how is progress against goal/target tracked?

(Select all that apply for each line) 

	Progress is not tracked	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
Water	☐	☒	☒	☐	☐
Air pollution	☐	☒	☒	☐	☐
Waste management	☐	☒	☒	☐	☐
Circularity	☐	☒	☐	☐	☐
Energy & resource use	☐	☒	☒	☐	☐

E3.1.2A. (Optional) Please provide additional information:

E4. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

(Select one answer option per line) i

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change	☒	☐	☐	☐
Water	☒	☐	☐	☐
Oceans	☒	☐	☐	☐
Nature and biodiversity	☒	☐	☐	☐
Air pollution	☒	☐	☐	☐
Waste management	☒	☐	☐	☐
Circularity	☒	☐	☐	☐
Energy & resource use	☒	☐	☐	☐
Other environmental topic(s)	☒	☐	☐	☐

E4A. (Optional) Please provide additional information:

E5. Within the reporting period, did the company measure Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)

	Known	Measured Total Emissions (tCO2e)	We did not measure our gross emissions (Please provide additional information)
Scope 1 emissions	☒	153	☐
Scope 2 (market-based) emissions	☐		☒
Scope 2 (location-based) emissions	☒	164	☐

E5A. We did not measure our gross emissions (Please provide additional information):

We have recently completed a comprehensive Greenhouse Gas (GHG) inventory for our packaging production operations. The values entered above have been rounded to the nearest whole number as per the instructions (Scope 1: 153.33 tCO2e; Scope 2 location-based: 163.58 tCO2e). Furthermore, we have also measured our Scope 3 emissions, which total 40,936,750 tCO2e, demonstrating our full supply chain visibility. As part of our ESG strategy and Quality Management System (QMS) continuous improvement, we are committed to mitigating our Scope 2 emissions by securing the I-REC certification by 2025, ensuring our operations are powered by verified renewable energy.

E5A. (Optional) Please provide additional information:

We have recently completed a comprehensive Greenhouse Gas (GHG) inventory for our packaging production operations. The values entered above have been rounded to the nearest whole number as per the instructions (Scope 1: 153.33 tCO2e; Scope 2 location-based: 163.58 tCO2e). Furthermore, we have also measured our Scope 3 emissions, which total 40,936,750 tCO2e, demonstrating our full supply chain visibility. As part of our ESG strategy and Quality Management System (QMS) continuous improvement, we are committed to mitigating our Scope 2 emissions by securing the I-REC certification by 2025, ensuring our operations are powered by verified renewable energy.

E6. Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros) ⓘ

	Known	Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	☒	40936750	☐	☐

E6A. (Optional) Please provide additional information:

We have comprehensively measured our Scope 3 emissions, demonstrating our commitment to full supply chain transparency. As a packaging manufacturer, it is expected that the vast majority of our carbon footprint resides in our value chain—specifically in the extraction and production of paper and paperboard raw materials by our suppliers. This data reinforces the strategic importance of our FSC certification, as it ensures we are sourcing from responsibly managed forests and actively engaging with our supply chain to manage these indirect environmental impacts.

E6.1. Which Scope 3 categories are included in the company's Scope 3 emissions calculation?

(Select all that apply) **i**

- ☒ **Purchased goods and services**
- ☒ **Capital goods**
- ☒ **Fuel- and energy-related activities**
- ☒ **Upstream transportation and distribution**
- ☒ **Waste generated in operations**
- ☒ **Business travel**
- ☐ Employee commuting
- ☐ Upstream leased assets
- ☒ **Downstream transportation and distribution**
- ☐ Processing of sold products
- ☐ Use of sold products
- ☒ **End-of-life treatment of sold products**
- ☐ Downstream leased assets
- ☐ Franchises
- ☐ Investments
- ☐ Other - upstream
- ☐ Other - downstream

E6.1A. (Optional) Please provide additional information:

Our Scope 3 emissions calculation encompasses the most material categories for a packaging converter. The vast majority of our footprint is concentrated in 'Purchased goods and services,' specifically attributed to the extraction and production of paper and paperboard by our suppliers. To manage this impact, we rely on our FSC certification to ensure responsible sourcing. Furthermore, we account for logistics (upstream and downstream transportation), 'Waste generated in operations' (rigorously managed and disposed of via CADRI), and the 'End-of-life treatment of sold products,' aligning our emissions tracking with our broader circularity and Quality Management System (QMS) goals.

E7. Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

(Select all that apply for each line. If have target(s), include the baseline year)i

	Short term (5-10 years)	Medium term (10-15 years)	Long term (20-30 years)	Baseline year (YYYY)	No targets set
Scope 1 targets validated by a third-party	☐	☐	☐	YYYY	☒
Scope 2 targets (market-based) validated by a third-party	☐	☐	☐	YYYY	☒
Scope 2 targets (location-based) validated by a third-party	☐	☐	☐	YYYY	☒
Scope 3 targets validated by a third-party	☐	☐	☐	YYYY	☒
All or some set targets not validated by a third-party	☒	☐	☐	2025	☐

E7A. (Optional) Please provide additional information:

Our greenhouse gas emissions were estimated using the EcoVadis carbon platform and methodology, establishing our baseline year. While we have set internal short-term targets to mitigate our footprint—most notably our commitment to securing the I-REC certification by 2025 to address our Scope 2 emissions—these reduction targets have not yet been formally validated by an external third-party scientific body, such as the Science Based Targets initiative (SBTi). We are continuously integrating these metrics into our Quality Management System (QMS) to mature our climate strategy and drive continuous improvement.

E8. Does the company have a climate change adaptation plan?

(Select all that apply) 

- ☐ Yes, and it includes physical risk assessments
- ☐ Yes, and it includes transition risk assessments
- ☐ Yes, and it includes a physical climate risk scenario analysis
- ☐ Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate
- ☒ **No, but we plan to within the next two years**
- ☐ No (Please provide additional information)

E8A. (Optional) Please provide additional information:

Our climate change adaptation strategy is actively being integrated into our broader Quality Management System (QMS). We evaluate physical environmental and operational risks to our packaging plant and supply chain using a standardized risk matrix, multiplying Probability and Impact, with results categorized strictly as High (5), Medium (3), or Low (1). Following the recent completion of our comprehensive GHG inventory, we are utilizing these risk assessments as a foundation to formalize a dedicated and comprehensive climate adaptation plan within the next two years, further building resilience across our operations.

E9. Has the company set targets to phase out fossil fuels?

(Select all that apply) 

- ☐ Yes, we have set targets to phase out fossil fuel-based materials
- ☐ Yes, we have set targets for investment in non-fossil fuel emitting activities
- ☒ **Yes, we have set targets for renewable energy procurement**
- ☐ Yes, we have set targets to end the exploration of fossil fuels, the expansion of existing fossil fuel reserves, the extraction of fossil fuels
- ☐ Yes, we have set other targets to phase out fossil fuel usage
- ☐ No, but we plan to within the next two years
- ☐ No

E9A. (Optional) Please provide additional information:

As part of our strategic commitment to decarbonize our operations, we have established a clear target for renewable energy procurement. Specifically, we are currently executing action plans within our Quality Management System (QMS) to secure the I-REC certification by 2025. This initiative will guarantee that our packaging manufacturing processes are powered by verified renewable energy sources, significantly mitigating our Scope 2 emissions and reducing our reliance on fossil fuel-based electricity from the conventional grid.

E10. Does the company have a transition plan containing policies, actions, investments, accountability mechanisms, and targets to limit global warming?

(Select all that apply) 

- ☐ Yes, it is aligned with science to limit global warming to 1.5°C
- ☐ Yes, it follows the mitigation hierarchy
- ☒ **Yes, it helps increase direct/indirect investment in renewable energy**
- ☒ **Yes, it transitions from fossil fuels to non-emitting energy sources such as renewables**
- ☐ Yes, it improves energy efficiency and substituting disposable materials for reusable materials
- ☐ Yes, it deploys GHG removal methods
- ☐ Yes, it describes the impacts on stakeholders, workers and the environment and the actions taken to manage them
- ☐ Yes, it describes how public policy activities, including lobbying activities, are consistent with the transition plan
- ☐ Yes, it factors into the organization's financial planning
- ☐ Yes, it is embedded in the business strategy
- ☒ **Yes, it is overseen by the highest governance body of the company**
- ☐ No transition plan (Please explain why it does not exist)

E10A. (Optional) Please provide additional information:

E11. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply) 

- ☐ Climate change
- ☐ Oceans
- ☒ **Energy & resource use**
- ☒ **Waste management**
- ☒ **Water**
- ☐ Nature and biodiversity
- ☐ Air pollution
- ☐ Circularity
- ☐ None of the topics have been identified as material by the company

E11A. (Optional) Please provide additional information:

Through our Quality Management System (QMS), we have identified the most material environmental topics directly connected to our packaging operations. 'Energy & resource use' is a key strategic priority, addressed by our commitment to securing the I-REC certification by 2025 for renewable energy. Furthermore, 'Waste management' and 'Water' represent our most critical operational aspects; these are rigorously controlled and monitored to ensure strict compliance with Brazilian environmental regulations, including CADRI approvals for responsible waste disposal and internal monitoring of industrial water consumption.

E12. Please provide details regarding the company's water withdrawal and consumption (own operations) within the reporting period.

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) 

	Known	Unknown	Not applicable (Please provide additional information)	Number
Total water withdrawal (Volume of water in megaliters)	☒	☐	☐	3
Percentage of water withdrawn in regions with high or extremely high water stress (%)	☐	☒	☐	
Total water consumption (Volume of water in megaliters)	☒	☐	☐	3
Percentage of water consumed in regions with high or extremely high water stress (%)	☐	☒	☐	

E12A. (Optional) Please provide additional information:

As an offset packaging and label converter, our manufacturing process is fundamentally dry. Water is not a primary raw material in our production line. Our water withdrawal and consumption are primarily associated with domestic and sanitary use by our workforce across our three operational shifts, as well as minor facility maintenance. All water is sourced from the local municipal utility network and is continuously monitored through our Quality Management System (QMS) to track intensity metrics, identify any anomalies, and ensure efficient usage.

E13. Please indicate the water basins of highest priority for engagement based on your direct operations and/or supply chains (up to 10).

If you select 'Not applicable' and move to the next page, you will not report on water basin locations.

☐ Known

☒ **Not Applicable**

E17. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

As an offset packaging converter, our environmental strategy is deeply integrated into our Quality Management System (QMS). During this reporting period, a major practical action was completing a comprehensive GHG inventory using the EcoVadis methodology, providing full visibility into our carbon footprint, particularly our Scope 3 emissions tied to raw materials. To manage this indirect impact, we actively maintain our FSC certification to ensure responsible paperboard sourcing. A key forward-looking goal is our commitment to secure the I-REC certification by 2025, transitioning our operations to verified renewable energy to mitigate Scope 2 emissions. Furthermore, we maintain rigorous waste management practices in strict compliance with Brazilian legislation, utilizing CADRI approvals. Our ongoing challenge is navigating value-chain emissions, which we address through continuous supplier engagement and robust external audits, such as our upcoming WCA (Workplace Conditions Assessment) renewal in May 2026, where our goal is to achieve a green score above 85%.

Anti-Corruption

[Click for additional guidance](#)

AC1. Does the company have an anti-corruption compliance programme?

(Select one that applies) 

- ☐ No, this is not a current priority
- ☐ No, but we plan to within the next two years
- ☒ **Yes**

AC1A. (Optional) Please provide additional information:

Our anti-corruption compliance is formally established in our Ethical Conduct and Anti-Corruption Declaration (Document DC-14.11). This corporate policy strictly prohibits any form of bribery, extortion, or undue advantage involving public officials or private entities. Beyond anti-corruption, our guidelines explicitly endorse the Universal Declaration of Human Rights and ILO conventions. To ensure the effectiveness of this program and maintain transparency, we operate a dedicated, confidential whistleblowing channel (escuta@congraf.com.br) accessible to employees, suppliers, and stakeholders. Compliance with these standards is continuously managed through our QMS and validated by external social assessments, such as the Workplace Conditions Assessment (WCA).

AC1.1. Is the anti-corruption compliance programme:

(Select all that apply) 

- ☐ Publicly available
- ☒ **Approved at most senior level of the company**
- ☒ **Applied to the company's own operations**
- ☒ **Applied to the company's own suppliers**
- ☒ **Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)**
- ☐ Other (Please provide additional information)

AC1.1A. (Optional) Please provide additional information:

Our anti-corruption and ethical conduct guidelines (Document DC-14.11) are approved by our senior management and applied comprehensively across our entire organization. The scope of this policy extends beyond our direct operations, actively engaging our value chain. It establishes clear prohibitions against bribery and sets strict compliance expectations for our raw material suppliers, subcontracted partners, and customers. To support this broad application, our confidential whistleblowing channel is accessible to both internal employees and external stakeholders, ensuring continuous monitoring and accountability throughout our supply chain.

AC1.2. Does the company monitor its anti-corruption compliance programme?

(Select all that apply) 

☒ **Yes, through review on an adhoc basis**

☐ Yes, through internal employee self-evaluations

☐ Yes, through automated controls monitoring

☒ **Yes, through external independent monitoring**

☐ Yes, through other mechanisms (Please provide additional information)

☐ No, we do not monitor the anti-corruption compliance programme
(Please provide additional information)

AC1.2A. (Optional) Please provide additional information:

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Select one that applies) 

☐ No, and we have no plans to develop any policy/recommendation

☐ No, but we plan to within the next two years

☒ **Yes, included within a broader policy or as a standalone policy**

AC2A. (Optional) Please provide additional information:

Our guidelines regarding conflicts of interest, gifts, hospitality, and interactions with both public and private entities are explicitly addressed within our broader Ethical Conduct and Anti-Corruption Declaration (Document DC-14.11). This corporate policy strictly prohibits employees and related third parties from offering or receiving any form of payment, gift, entertainment, sponsorship, or charitable donation that could be characterized as a bribe, kickback, or an attempt to secure an undue advantage. Should any doubts or potential conflicts of interest arise, employees are encouraged to seek guidance and report situations through our dedicated and confidential communication channel (escuta@congraf.com.br).

AC3. Does the company engage in collective action against corruption?

(Select one that applies) i

- ☐ No, this is not a current priority
- ☒ **No, but we plan to in the next two years**
- ☐ Yes (Please provide additional information)

AC3A. (Optional) Please provide additional information:

AC4. Who receives training on anti-corruption and integrity?

(Select all that apply) 

- ☐ All employees
- ☒ **Selected employees (Please provide additional information)**
- ☐ Third-party suppliers, contractors and/or consultants
- ☐ No training provided

AC4A. Selected employees (Please provide additional information):

We employ a risk-based approach to our anti-corruption and integrity training program. Specific training on our Ethical Conduct and Anti-Corruption Declaration (Document DC-14.11) is strategically targeted at employees in roles with a higher exposure to potential conflicts of interest. This includes our procurement team (buyers), commercial and sales representatives, and any staff members who directly interact with suppliers, clients, public officials, and external stakeholders. This targeted methodology ensures that the personnel most vulnerable to compliance risks are fully equipped to navigate them ethically and utilize our whistleblowing channel effectively.

AC4A. (Optional) Please provide additional information:

We employ a risk-based approach to our anti-corruption and integrity training program. Specific training on our Ethical Conduct and Anti-Corruption Declaration (Document DC-14.11) is strategically targeted at employees in roles with a higher exposure to potential conflicts of interest. This includes our procurement team (buyers), commercial and sales representatives, and any staff members who directly interact with suppliers, clients, public officials, and external stakeholders. This targeted methodology ensures that the personnel most vulnerable to compliance risks are fully equipped to navigate them ethically and utilize our whistleblowing channel effectively.

AC4.1. How often is such training provided?

(Select one answer option per line) i

	One time only	Every two or more years	Every year	Unknown
Selected employees	☐	☒	☐	☐

AC4.1A. (Optional) Please provide additional information:

AC5. What mechanisms does the company have in place to detect incidents of corruption?

(Select all that apply) **i**

- ☒ **Internal reporting channels (e.g., confidential or anonymous speak-up mechanisms)**
- ☒ **Whistleblower protection**
- ☐ Internal audits, compliance reviews, or other forms of controls
- ☐ Third-party due diligence and ongoing monitoring
- ☒ **External reporting channels (e.g., grievance or complaint mechanisms)**
- ☐ External audits or independent reviews
- ☐ Other (Please provide additional information)
- ☐ No mechanisms in place to detect incidents of corruption

AC5A. (Optional) Please provide additional information:

AC5.1. Within the reporting period, what actions has the company taken to address suspected incidents of corruption?

(Select all that apply) **i**

- ☐ Internal measures (e.g. internal investigation, review by board of directors, review by ethics committee)
- ☐ External measures (e.g., audit, review, report to and collaborate with authorities)
- ☐ Other (Please provide additional information)
- ☐ No actions were taken to address suspected incidents of corruption
- ☒ **No incidents of corruption suspected**

AC5.1A. (Optional) Please provide additional information:

AC6. (Optional) Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.[i](#)

During this reporting period, our primary practical action regarding the anti-corruption principle was the rigorous enforcement of our Ethical Conduct and Anti-Corruption Declaration (Document DC-14.11), supported by targeted annual training for employees in high-exposure roles, such as procurement and sales. A continuous challenge in compliance management is ensuring absolute anonymity and independent handling of potential grievances. As a strategic plan for the near future, we are preparing to implement 'Contato Seguro,' a specialized third-party platform that will modernize and expand our whistleblowing and grievance mechanisms

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.1. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Carbon Estimator Report - GEE - CONGRAF 2025.pdf

87.6 KB

application/pdf

R5.2. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

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Please do not close the page.