

Holmen's GRI Content Index 2021

Holmen conducted a root and branch materiality analysis in 2018 to establish our role in a sustainable future. The work included both internal and external stakeholders, with the results of the analysis providing the basis for the development of Holmen's Group- wide sustainability work, and thus, Holmen sustainability reporting.

Holmen awaits EU Corporate Sustainability Reporting Directive (CSRD) before issuing a new extensive materiality assessment. In the meantime, insights that the assessment performed in 2018 provided us have been developed.

More information about Holmen's Materiality Assessment is found on:

Materiality analysis

This GRI-Content Index is published on Holmen's webpage:

Sustainability reporting

We report according to GRI-standards year 2016, core level. For Occupational health and safety (405) and water and effluents (303) we report according to 2018 years GRI-standard. For waste (306) we report according to 2020 years GRI-standard.

General Standard Disclosures 2021

GRI-		
disclosure	Disclosure name	Page reference to annual report 2021 or web reference
Organizatio	nal profile	
102-1	Name of the organization	Holmen Annual Report page 2
102-2	Activities, brands, products, and services	Holmen Annual Report page 16-25
102-3	Location of headquarters	Holmen Annual Report page 96, back cover
102-4	Location of operations	Holmen Annual Report page 97



102-5	Ownership and legal form	Holmen Annual Report page 48-49
102-6	Markets served	Holmen Annual Report page 16-25, 97
102-7	Scale of the organization	Holmen Annual Report page 16-25, 61 not 2, 64 not 4, 94, 96-97
102-8	Information on employees and other workers	Holmen Annual Report Page 64 not 4, 95 Social key figures Supplier follow-up
		Supplier assessment Silviculture contractors Omission: Holmen does not disclose gender and age distribution by employment contract, nor gender distribution by employment
		type as this is not considered material.
102-9	Supply chain	Holmen Annual Report page 6-7, 16-25, 44 Supplier follow-up Supplier assessment Climate risks and opportunities Silviculture contractors Certified forestry
102-10	Significant changes to the organization and its supply chain	Holmen Annual Report page 12-13, 94 <u>Sustainability report</u> <u>Supplier follow-up</u>
102-11	Precautionary Principle or approach	Holmen Annual Report page 34
102-12	External initiatives	Holmen Annual Report page 31 <u>Awards</u> <u>Permits, Certificates and Management systems</u> <u>Certificates</u>



		Iggesund Certificates	
102-13	Membership of associations	Research and development	
		Industry organisations	
		Foundations associated with Holmen	
Strategy			
102-14	Statement from senior decision-maker	Holmen Annual Report page 4-5, 31, 41-42	
Ethics and i	integrity		
102-16	Values, principles, standards, and norms of	Holmen Annual Report page 36-37, 41	
	behaviour	Code of Conduct and Policies	
		Holmen's Core Values	
Governance	9		
102-18	Governance structure	Holmen Annual Report page 38-42	
		Organisation and management	
		Governance	
		Environmental management	
		<u>Employees</u>	
		<u>Financial management</u>	
102-24	Nominating and selecting the highest governance body	Holmen Annual Report page 38-39	
Stakeholde	Stakeholder engagement		
102-40	List of stakeholder groups	Stakeholder dialogue - Please see more information by clicking on the plus-sign to the left on this page	
102-41	Collective bargaining agreements	Holmen Annual Report page 95	
		Union co-operation	
102-42	Identifying and selecting stakeholders	Stakeholder dialogue - Please see more information by clicking on the plus-sign to the left on this page	



		Matariality and hair
		Materiality analysis
		Holmen materiality assessment 2018
102-43	Approach to stakeholder engagement	Stakeholder dialogue - Please see more information by clicking on the plus-sign to the left on this page
		Materiality analysis
		Holmen materiality assessment 2018
102-44	Key topics and concerns raised	Holmen Annual Report page 30
		Stakeholder dialogue - Please see more information by clicking on the plus-sign to the left on this page
		Materiality analysis
		Page 4-5: Holmen materiality assessment 2018
Reporting p	orinciples	
102-45	Entities included in the consolidated	Holmen Annual Report page 80 not 23
	financial	Sustainability report
	statements	
102-46	Defining report content and topic	Sustainability report
	boundaries	Materiality analysis
		Holmen materiality assessment 2018
102-47	List of material topics	Materiality analysis
		Page 3: Holmen materiality assessment 2018
102-48	Restatements of information	Holmen Annual Report page 95
		<u>Sustainability report</u>
		Greenhouse gas emissions scope 1,2,3
		Climate benefit value chain
102-49	Changes in reporting	Sustainability report
		Materiality analysis
102-50	Reporting period	Holmen Annual Report page 2



		Sustainability report
102-51	Date of the most recent report	Sustainability report
102-52	Reporting cycle	Sustainability report
102-53	Contact point for questions regarding the report	Reporting
102-54	Claims of reporting in accordance with the	Holmen Annual Report page 2
	GRI Standards	Sustainability report
102-55	GRI content index	Sustainability report
102-56	External assurance	Holmen Annual Report page 85-87
		Sustainability report
		Assurance Report



Specific Standard Disclosures 2021

GRI-		
disclosure	Disclosure name	Page reference or web reference
Economic		
Economic p	performance	
201-MAD	Management approach disclosure	Holmen Annual Report page 8-9, 30, 38-42, 46-47, 50, 61 not 2, 63 not 4, 65-66 not 7
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Goals and management by objectives
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Healthy profitability
201-1	Direct economic value generated and	Holmen Annual Report page 8, 9, 63 not 4, 65- 66 not 7, 95
	distributed	Contribution to society
Anti-corrup	tion	
205- MAD	Management approach disclosure	Holmen Annual Report page 30, 41
		Materiality analysis



		Halman matariality accomment 2010
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Business ethics
		Business ethics policy
		Whistleblower
		Comment: Anti-corruption was not deemed to be significant in Holmen's materiality assessment 2018. Still the number of questions
		Holmen receive within the topic justifies that Holmen include the topic in our GRI-report.
205-3	Confirmed incidents of corruption and	Holmen Annual Report page 45
	actions taken	Supplier follow-up
		<u>Supplier assessment</u>
		Comment: Anti-corruption was not deemed to be significant in Holmen's materiality assessment 2018. Still the number of questions
		Holmen receive within the topic justifies that Holmen include the topic in our GRI-report.
Environmer	ntal	
Materials		
301- MAD	Management approach disclosure	Holmen Annual Report page 30, 34-35
	Tranagement approach alloctodate	Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct



		Goals and management by objectives
		Risk management
		Environmental management
		Environmental sustainability
		Chemicals
301-1	Materials used by weight or volume	Holmen Annual Report page 27, 94
		Environmental key figures
Energy		
302- MAD	Management approach disclosure	Holmen Annual Report page 4, 24-25, 30, 34-35
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		<u>Governance</u>
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Environmental sustainability</u>
		Environmental management
		<u>Energy</u>
302-1	Energy consumption within the	Holmen Annual Report page 94
	organization	Environmental key figures
		<u>Energy</u>
		Miljöarbetet vid Iggesunds bruk 2021
		Miljöarbetet vid Hallsta pappersbruk 2021



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		Omission: All of Holmen's consumed steam is internally produced using by-products. A negligible part of the steam is produced from
		purchased biofuels, purchased electricity, and purchased oil. As a result, we do not report on disclosure GRI302-1 c. iv.
		Holmen does not sell cooling and only a negligible amount of steam, hence we do not report on disclosure 302-c. iii nor 302-d. iv.
Vater		
303- MAD	Management approach disclosure	Comment: Water was not deemed to be significant in Holmen's materiality assessment 2018. Still the number of questions Holmen receive within the topic justifies that Holmen include the topic in our GRI-report. Holmen's reporting regarding the 303 water-disclosure includes the most essential KPIs, but not all the required KPIs
		Holmen Annual Report page 26, 30, 34-35
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Environmental management
		<u>Environmental sustainability</u>
		<u>Water</u>
		Environmental work at our units - see attached PDF's
303-1	Interactions with water as shared	Holmen Annual Report page 26, 34-35
	resource	<u>Water</u>
		Environmental work at our units - see attached PDF's
303-2	Management of water discharge-related	Holmen Annual Report page 34-35
	impacts	<u>Water</u>
		Environmental work at our units - see attached PDF's



303-3	Water withdrawal	Holmen Annual Report page 26, 94
303-3	Water Withdrawat	Water
		Environmental work at our units - see attached PDF's
Biodiversity	1	
304- MAD	Management approach disclosure	Holmen Annual Report page 16, 26, 28-30, 34-35
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		<u>Governance</u>
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Environmental management
		Environmental sustainability
		Land acreage
		Environmental work at our units - see attached PDF's
		Future-smart forests
		<u>Certified forestry</u>
		Research and development
		Responsible forestry
304-3	Habitats protected or restored	Land acreage
		Environmental work at our units - see attached PDF's
		Future-smart forests
		<u>Certified forestry</u>
		Research and development



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		Responsible forestry
		Voluntary set-aside nature conservation areas in Sweden - not available in English. This map shows the voluntary set-aside for nature
		conservation areas of six large forest owners in Sweden, Holmen included. The map also shows the formal forms of protection for
		which the state is responsible.
		Omission: Since Holmen owns 1,3 million ha land, it is not possible to report status of each area based on its condition.
Emissions		
305- MAD	Management approach disclosure	Holmen Annual Report page 9, 30, 32-35
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Environmental management
		Environmental sustainability
		Greenhouse gas emissions scope 1,2,3
		<u>Transports</u>
		Climate risks and opportunities
305-1	Direct (Scope 1) GHG emissions	Holmen Annual Report page 32-33, 94-95
		Greenhouse gas emissions scope 1,2,3
		Climate benefit value chain
		Environmental key figures
		Environmental investments, revenues, and costs
305-2	Energy indirect (Scope 2) GHG emissions	Holmen Annual Report page 32-33, 94-95



		Greenhouse gas emissions scope 1,2,3
		Climate benefit value chain
		Environmental key figures
		Supplier follow-up
		<u>Supplier assessment</u>
		Climate risks and opportunities
305-3	Other indirect (Scope 3) GHG emissions	Holmen Annual Report page 32-33, 94-95
		Greenhouse gas emissions scope 1,2,3
		Climate benefit value chain
		Environmental key figures
		Climate risks and opportunities
305-7	Nitrogen oxides (NOX), sulphur oxides	Holmen Annual Report page 94
	(SOX), and other significant air emissions	Environmental work at our units - see attached PDF's
		Environmental key figures
Effluent and	d waste	
306- MAD	Management approach disclosure	Holmen Annual Report page 26, 30, 34-35
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Environmental management</u>
		By-products and waste



		Environmental work at our units - see attached PDF's
306-1	Waste generation and significant waste-	Holmen Annual Report page 26, 94
	related impacts	By-products and waste
		Environmental work at our units - see attached PDF's
306-2	Management of significant waste-related	Holmen Annual Report page 26, 94
	impacts	By-products and waste
		Environmental work at our units - see attached PDF's
306-3	Waste generated	Holmen Annual Report page 26, 94
		Environmental work at our units - see attached PDF's
Environme	ntal compliance	
307- MAD	Management approach disclosure	Holmen Annual Report page 30, 34-35, 45
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Environmental management
		Environmental sustainability
		Environmental investments, revenues, and costs
		Environmental work at our units - see text and attached PDF's
307-1	Non-compliance with environmental	Holmen Annual Report page 34-35, 45
	laws and regulations	Environmental investments, revenues, and costs
		Environmental work at our units - see text and attached PDF's



Supplier en	Supplier environmental assessment		
308- MAD	Management approach disclosure	Holmen Annual Report page 30, 37, 44-45	
		Materiality analysis	
		Holmen materiality assessment 2018	
		Organisation and management	
		Governance	
		Code of Conduct and Policies	
		Policies and code of conduct	
		Goals and management by objectives	
		Risk management	
		Supplier follow-up	
		<u>Supplier assessment</u>	
		Climate risks and opportunities	
		Silviculture contractors	
		<u>Certified forestry</u>	
308-1	New suppliers that were screened using environmental criteria	Supplier follow-up	
		<u>Supplier assessment</u>	
		Climate risks and opportunities	
		Silviculture contractors	
308-2	Negative environmental impacts in the supply chain and actions taken	Holmen Annual Report page 37, 44-45	
		Supplier follow-up	
		<u>Supplier assessment</u>	
		Climate risks and opportunities	
		Silviculture contractors	
Social			

Employment



401- MAD	Management approach disclosure	Holmen Annual Report page 30, 36-37, 43, 45	
		Materiality analysis	
		Holmen materiality assessment 2018	
		Organisation and management	
		Governance	
		Code of Conduct and Policies	
		Policies and code of conduct	
		Goals and management by objectives	
		Risk management	
		<u>Employees</u>	
		Employee dialogue	
401-1	New employee hires and employee turnover	Holmen Annual Report page 95	
		Social key figures	
		Omissions:	
		a. Holmen does not report number nor rate of new employee per age group, gender and region during the reporting period, since this information is not considered relevant.	
		b. Holmen does not report number nor rate of employee turnover during the reporting period, by region, age group or gender, since this information is not considered relevant.	
		2.1. Holmen report the total number of employees at the end of the reporting period on the website above. However, Holmen has calculated the rates of new employee hires and employee turnover based on FTE.	
Occupation	Occupational health and safety		
403- MAD	Management approach disclosure	Holmen Annual Report page 30, 36-37, 41, 45	
		Materiality analysis	
		Holmen materiality assessment 2018	
		Organisation and management	
		Governance	
		Code of Conduct and Policies	



		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Employees</u>
		Health and safety
403-1	Occupational health and safety	Holmen Annual Report page 35, 95
	management system	Health and safety
		Sustainability report
		Supplier follow-up
		<u>Supplier assessment</u>
		<u>Climate risks and opportunities</u>
		Silviculture contractors
403-2	Hazard identification, risk assessment, and incident investigation	Holmen Annual Report page 45
		Health and safety
		<u>Chemicals</u>
403-3	Occupational health services	Health and safety
403-4	Worker participation, consultation, and	Health and safety
	communication on occupational health	
	and safety	
403-5	Worker training on occupational health and safety	Health and safety
403-6	Promotion of worker health	Health and safety
403-7	Prevention and mitigation of	Holmen Annual Report page 45
	occupational health and safety impacts	Comment: There are no sites where Holmen does not have control over work or workplace.
	directly linked by business relationships	
403-9	Work-related injuries	Holmen Annual Report page 37, 95
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		Health and safety
		<u>Chemicals</u>
		Social key figures
		Omission: Holmen does not report number of hours worked by employees nor workers who are not employees, since this information
		is not considered relevant.
Training an	d education	
404- MAD	Management approach disclosure	Holmen Annual Report page 30, 36
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Employees</u>
		Talent management
		Skills development
404-2	Programs for upgrading employee skills and transition assistance programs	Holmen Annual Report page 36
		Talent management
		Skills development
		Omission: Holmen does not report management of career endings since we have not had any major notices nor retirements.
Diversity ar	nd equal opportunity	
405- MAD	Management approach disclosure	Holmen Annual Report page 30, 36–37, 39, 41
		Materiality analysis
		Holmen materiality assessment 2018
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		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Employees</u>
		Equal treatment
405-1	Diversity of governance bodies and	Holmen Annual Report page 39, 88-90, 95
	employees	Equal treatment
		Social key figures
		Omissions:
		a.ii Holmen does not report on the percentage of individuals within Holmen's governance bodies in age group categories, as the age of Holmen's governance body can be found on page 88-90 in Holmen Annual Report.
		b.ii. Age is reported in the employee categories blue collar, and white collar and not according to the suggested categorization n disclosure 405-1
Non- discrir	mination Local communities	
406- MAD	Management approach disclosure	Holmen Annual Report page 30, 36–37, 41
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		<u>Employees</u>
1		



		Equal treatment
406-1	Incidents of discrimination and corrective actions taken	Holmen Annual Report page 37, 41
		Equal treatment
		Supplier follow-up
		<u>Supplier assessment</u>
		Silviculture contractors
413- MAD	Management approach disclosure	Holmen Annual Report page 10, 16, 30, 35, 95
		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Thriving rural communities
		Society
		Environmental work at our units
413-2	Operations with significant, actual and potential negative impacts on local communities	Holmen Annual Report page 16, 35, 95
		Environmental investments, revenues, and costs
		Society
		Social assets of the forest
		Environmental work at our units
		Financial contribution to society
Supplier so	cial assessment	
414- MAD	Management approach disclosure	Holmen Annual Report page 30, 37, 44-45



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		Materiality analysis
		Holmen materiality assessment 2018
		Organisation and management
		Governance
		Code of Conduct and Policies
		Policies and code of conduct
		Goals and management by objectives
		Risk management
		Supplier follow-up
		<u>Supplier assessment</u>
		Climate risks and opportunities
		Silviculture contractors
		<u>Certified forestry</u>
414-1	New suppliers that were screened using	Supplier follow-up
	social criteria	<u>Supplier assessment</u>
		Silviculture contractors
414-2	Negative social impacts in the supply chain and actions taken	Holmen Annual Report page 37, 44-45
		Supplier follow-up
		Supplier assessment
		Silviculture contractors