

ENVIRONMENTAL REPORT 2023

Think ahead for sustainability.

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o Preface

Our environmental management system in accordance with the international standard DIN EN ISO 14001 was introduced in 1997 and, together with the quality management system certified for the first time in April 1993 in accordance with DIN EN ISO 9001, forms a building block in the future-oriented and international business policy of the company.

With this environmental report we present our current environmental data to our customers, neighbours and interested parties.

Rudolf GmbH is a strongly export-oriented company and is represented on all continents with its own companies or partners. The heart of this group of companies is the parent plant in Geretsried.

In addition to our claim to a high level of quality, environmental protection, safety at work and product safety as well as ecological product requirements are indispensable components of our corporate policy. We want to be known for this in our markets. On the basis of this self-image, we can further develop the future of Rudolf GmbH and survive on the world market. We are happy to answer questions arising from the study of the report and offer dialogue with a medium-sized group of companies in the chemical industry to anyone interested.

> Rudolf GmbH The management

Munan

Wolfgang Schumann

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Olive Kushh

Dr. Gunther Duschek

Dr. Oliver Kusterle

Geretsried, 25.06.2023

1 The company and the Geretsried site

In the centre of an important textile area in Varnsdorf (Sudetenland), Che- mische Fabrik Rudolf & Co. KG was founded. After the end of the war, the company was re-established at its current location in Geretsried. At that time, Geretsried consisted of the remains of a former armaments factory. The company was restarted and the domestic and foreign markets were rebuilt in a bunker allocated by the American military administration.

Today's Rudolf GmbH is an internationally operating group of companies with its own companies and representatives in over 50 countries on all continents. The sales programme includes textile auxiliaries for all stages of textile finishing as well as products for textile care and building protection. One focus is still the manufacture of customised special products for specific textile qualities, process steps or textile machines.

In the town of Geretsried with a good 26,000 inhabitants and a distinctly medium-sized economic structure, Rudolf GmbH with 385 employees is one of the large industrial companies.

The Geretsried plant is located in the southern industrial estate and is connected to the municipal road network via two plant gates.

The factory site is surrounded to the south, east and west by other industrial areas (mechanical engineering, former electroplating) and borders directly on a large residential area on the north side. On the 44,000 m² site there are 21 buildings (from the transformer house to the high-bay warehouse). to the high-bay warehouse), 3 of which date back to the time of the munitions factory. A new exhaust air purification plant was put into operation at the beginning of 2018.

The buildings are embedded in green spaces and wooded areas.

Rudolf GmbH has had an ISO 9001 certified quality management system since 1993. In August 1997, the certified environmental management system according to ISO 14001 was added.

Product quality, environmental protection and safety are a common and inseparable prerequisite for international market success.



2 Activities at the site

Products

Rudolf GmbH processes approx. 740 raw materials (mainly on an organic-chemical basis) into approx. 855 different sales products. Most of these products are used as textile auxiliaries for pre-treatment (e.g. desizing, washing, bleaching) and for finishing (e.g. soft handle, water, oil or soil repellency, coating). Textile dyes and auxiliaries for textile printing are of minor importance. In contrast, products for textile care, which are used in industrial laundries or as active ingredients for impregnation sprays, are significant. A relatively new but steadily growing segment is building protection with our own special products based on the know-how of textile auxiliaries.

Our products have to meet a large number of legal requirements, e.g. clear labelling for handling and transport, biodegradability in sewage treatment plants or water bodies, defined air emissions during processing and assessment of the effects on humans when using the finished textiles.

Processes

The entire production has been approved in accordance with the Federal Immission Control Act (BImSchG) and is subject to the Major Accidents Ordinance (upper class). This imposes a number of obligations, e.g. comprehensive safety assessments and the preparation of an operational hazard prevention plan, which is regularly revised. The products are processed by chemical and physical methods in closed reactors under very different process conditions (under vacuum and up to 6 bar). (under vacuum and up to 6 bar overpressure as well as at temperatures up to 175 °C). Chemical processes are, for example, polymerisations, esterifications,

amidations and are carried out in one or more stages. Physical processes include simple mixing processes but also single- and multi-stage emulsification processes using special homogenising machines.

A new plant that continuously generates a product through a chemical reaction was commissioned at the end of 2018.

The exhaust air volumes that occur during the charging and operation of the agitators and reactors are treated in 2 central exhaust air purification systems. One system consists of a cryogenic system, a scrubber and three activated carbon adsorbers, two of which are in operation and one of which is being regenerated or is on standby. The second plant consists of a combustion chamber using the regenerative thermal oxidation process.

As part of self-monitoring, a wastewater analysis is carried out daily.

All hazardous substances used in the plant are recorded in a hazardous substances register as part of the diverse work on occupational safety and health protection for the employees. Daily updated storage lists are kept available for the fire brigade and the police. When operating all buildings and facilities, special attention must be paid to groundwater protection. This list is only an example.

2 Activities at the site

Storage and transport

The delivery of the raw materials or the shipment of our products is carried out by a variety of carriers. The raw materials and products are packed in drums, canisters, containers or bags. Key raw materials are obtained in tankers.

The fully automated high-bay warehouse, various special warehouses (e.g. for flammable liquids and special hazardous substances, as well as various heating cabinets) and the tank farm are available for storing the raw materials and products. The storage buildings are equipped with automatic fire detectors and extinguishing systems adapted to the stored goods. More than 600 m³ of extinguishing water is constantly supplied to the plant. A buffer warehouse, which was put into operation in 2012, is used on the one hand for the intermediate storage of products manufactured during the night shift, and on the other hand for the intermediate storage of goods with shipping labels for which the capacity of the transshipment hall is no longer sufficient. High-bay storage and buffer storage are located in liquid-tight tubs that can hold a total of more than 3250 m³ of extinguishing water.

The transport of chemical raw materials and products differs fundamentally from the transport of other industrial goods. The international dangerous goods regulations regulate in detail the type of packaging, the quantity to be loaded and the associated loading documents. Even if only a part of the Rudolf products is subject to the Dangerous Goods Ordinance, the forwarding agents are required to meet a high quality standard for the transport of products. Detailed agreements are made with the Rudolf GmbH, detailed forwarding agreements have been made.

Objectives

When optimising products or production facilities, emphasis is placed on the following aspects:

Products

- Good effect properties
- Good process properties
- Good biodegradability
- Low water pollution when used by the customer
- Low air emissions during processing
- No use of indispensable components (e.g. preservatives) Minimisation of ecologically or toxicologically problematic components

Production facilities

- Minimisation of safety and environmental risks in the planning phase
- Consideration of all legal requirements through close dialogue with the specialist authorities in the planning phase
- Safety analysis for complex plants together with external experts in the Planning phase
- Preventive maintenance of all safety and environmentally relevant plant components
- Operational alarm and hazard prevention plan as an aid to action in the event of operational disruptions
- Newly introduced written circulation and approval procedure for even the smallest plant modifications

<u>3 Environmental impact</u>

The environmental impacts of production, office operations and storage include the following:

Energy

- for steam generation (heating medium in production)
- for driving electric motors
- for space heating

Water

- for production (as a product component)
- for steam generation
- for cooling reactors and stirrers
- for laboratory work
- for sanitary purposes
- for cleaning purposes

These activities produce:

Waste heat

- due to heat losses
- through cooling with water
- due to flue gases from burns

Waste water

- from production (cleaning of reactors, pumps, etc.)
- from the exhaust air purification (exhaust air scrubber)
- from steam generation and water treatment
- from the laboratories
- from the sanitary facilities

Waste

- of non-reusable packaging / containers
- from chemical production ("hazardous waste"
- from the workshops (metal, electrical)
- from the offices (paper, etc.)
- from laboratories (paper, glass, chemical residues)

Exhaust air and exhaust gases

- from production
- from the flue gases
- from various extraction systems

Noise

- due to car traffic of employees and visitors
- due to lorry traffic during delivery and dispatch
- due to forklift traffic in the factory
- by fans of the ventilation and exhaust air systems

Energy consumption

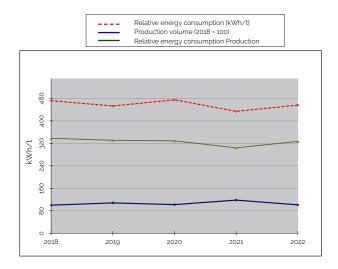
The annual consumption figures for the years 2018 to 2022 are as follows. The relative figures refer to the respective annual production volume:

	Natural gas EL heating oil Electricity		
	[kWh/a]	[kWh/a]	[kWh/a]
2018	14.391.131	 118.137	3.893.738
2019	15.136.391	139.795	3.829.443
2020	15.049.688	47.255	3.774.415
2021	15.637.471	312.631	3.979.928
2022	12.727.764	1.389.210	3.782.756

	Total [kWh/a] c	Relative Energy onsumptio	Production volume m
		[kWh/t]	(2018 = 100)
2018	18.403.006	472	100
2019	19.105.629	453	108
2020	18.873.943	475	102
2021	19.930.030	434	118
2022	17.899.730	456	101

	Relative energy consumption Production [kWh/t]
2018	338
2019	331
2020	329
2021	304
2022	327

Energy consumption per tonne



Evaluation:

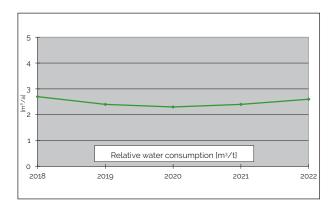
Depending on the season, one third to one half of the gas consumed is needed to heat the many buildings spread across the plant site. In a cold winter month, about twice the amount of gas is consumed compared to a warm summer month. For process steam generation, there is a boiler house that can be run on natural gas or extra-light fuel oil, and another gas-fired boiler in a production area. An oil-fired boiler is still available as a reserve.

The relative energy consumption is approx. 7.6 % above the previous year's value, which we justify with a lower utilisation of the production facilities.

An external energy audit was carried out at Rudolf GmbH for the last time in 2019. The introduction of an energy management system has been delayed once again. Work on this will begin in the second half of 2023.

	Total water consumptio [m³/a]	Water consumption on [m³/t]	
2018	103.585	2,7	
2019	100.080	2,4	108
2020	93.267	2,3	102
2021	110.369	2,4	118
2022	100.250	2,6	101

Water consumption per tonne of product



Evaluation:

In recent years, Rudolf GmbH has covered more than 80 % of its water needs from a service water well commissioned in 2004. This conserves the increasingly precious drinking water supplies.

Water consumption in 2022 is above the level of the last three years.

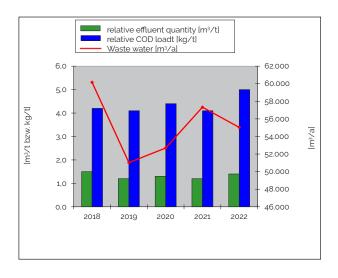
Road salt applied to roads in winter penetrates the groundwater within 3 - 6 months. In 2022, the groundwater level in the region was also low and therefore the salinity of the groundwater was particularly high. Therefore, as in previous years, drinking water was partially added in 2022 when producing fully desalinated water for production from groundwater. Due to the higher salt content in the groundwater, an increased amount of water must be discarded in the production of demineralised water, which leads to an increased water consumption of groundwater.

Waste water

	Waste water COD load	
	[m³/a]	[t/a]
2018	60.162	165
2019	51.024	173
2020	52.690	175
2021	57.327	190
2022	55.038	198

	Relative effluent quantity [m³/t]	Relative COD- load [kg/t]	Production quantity (2018 = 100)
2018	1,5	4,2	100
2019	1,2	4,1	108
2020	1,3	4,4	102
2021	1,2	4,1	118
2022	1,4	5,0	101

Effluent quantities and COD load



Typical wastewater analysis (Monthly values from daily composite samples 2022)

The fluctuations are caused by discontinuous production.			
	Averages	Limits	
pH-value	7,3-8,3	6,5-9,5	
COD [mg/l]	1.810-5.740	none	
BOD ₅ [mg/l]	120-2.200	none	
COD/BOD ₅ - ratio	1,9-32	none	
AOX [mg/l]	0,47*	< 0,39	
MBAS [mg/l]	0,05-8,84	none	
BIAS [mg/l]	53-520	none	
Zinc [mg/l]	< 0,52	< 2	
Tin [mg/l]	< 1,50	<2	

* Limit value AOX were exceeded several times in 2022. Rudolf GmbH is in close contact with the responsible water authority. An analysis value was also shown for a wastewater sample that could not contain any AOX. Therefore, a matrix effect of the Rudolf wastewater, which cannot yet be described in more detail, is to be assumed.

The Isarspitz wastewater treatment plant in Wolfratshausen-Weidach had an inflow of 3.939 million cubic metres of wastewater in 2019. The share of Rudolf wastewater in this amounted to 1.46 %. Looking at the COD values, it can be seen that the average COD in the inflow to the wastewater treatment plant in 2019 was 913 g/cbm. In the wastewater of Rudolf GmbH, this value was 3.394 g/cbm, i.e. as industrial wastewater only about 3.5 times higher than the average value. Rudolf GmbH's share of the total COD load of the wastewater treatment plant was 4.8 % in 2019.

Data from the Isar-Loisach wastewater association for the Weidach wastewater treatment plant are unfortunately not available for the years from 2020.

Evaluation:

Rudolf GmbH's wastewater is collected in a mixing and equalisation plant during a working day, mechanically pre-clarified and neutralised. The wastewater, which is mainly discharged into the public sewer system at night, is easily biodegradable or eliminable. In Rudolf GmbH's wastewater plant, water-insoluble components (e.g. oils, greases, waxes, polymers) are mechanically separated as a first step and disposed of as hazardous waste. The share of Rudolf wastewater in the total wastewater of the Weidach sewage treatment plant is much lower than is often assumed by the public. By coordinating the discharge of Rudolf wastewater with the Weidach treatment plant, we make an important contribution to ensuring that the biological stage of the treatment plant can maintain its efficiency even during the night, when almost no wastewater is discharged from the domestic sector.

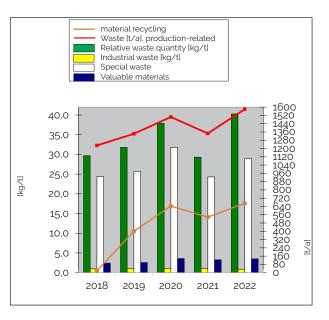


Waste

	Waste (production- related) ad [t/a]	Relative waste- ccumulation [kg/t]	Industrial waste [kg/t]
2018	1.230	29,7	0,98
2019	1.342	31,8	1,07
2020	1.505	37,9	1,10
2021	1.346	29,3	1,02
2022	1.580	40,3	0,89

	Special waste	materials	Production quantity
	[kg/t]	(wood, paper	,
		sheets, metal)
<u> </u>		– —[kg∕t] —	(2018 = 100) —
2018	24,39	2,45	100
2019	25,70	2,59	108
2020	31,79	3,59	102
2021	24,29	3,27	118
2022	28,97	3,50	101

Amount of waste per tonne of product



The waste types and quantities of normal operations were assessed, excluding the construction waste that inevitably arises during building conversions and plant dismantling.

Evaluation:

Both the absolute and the specific amount of production-related waste increased compared to the previous year. This is primarily due to one-time extensive warehouse clearances in the high-bay warehouse. Approx. 68 % of the waste was recycled, the rest (approx. 32 %) was disposed of. About 18 % of the total waste could be classified as "non-hazardous", thus about 82 % of the total waste was classified as "hazardous".

The commercial waste, which includes waste similar to household waste from the entire plant, is recycled. It is pre-sorted in the corresponding plant in order to increase the recycling rate.

Hazardous waste includes not only overstocked or no longer needed products, but also faulty and trial batches, but primarily contaminated solvents that have been distilled off during production. This includes filter plates and used gloves, breathing filters or cleaning rags. All hazardous waste for disposal must be disposed of at GSB Sonderabfall-Entsorgung Bayern GmbH in Baar-Ebenhausen near Ingolstadt due to legal requirements.

As before, a large part of the contaminated solvents is recycled. We also obtain fresh goods from the site that recycles our solvents, which has

reduced the number of journeys. This aspect is all the more important as the amount of solvents used has continued to increase in 2022 with our increasingly complex manufacturing processes.

German customers can return used containers for reconditioning via a take-back system. Depending on the type of container, 80 - 100 % of the containers used at Rudolf GmbH come from reconditioning.

Exhaust air from steam generation/heating

22
)7
9
)4

Evaluation:

Due to the approx. 11.5 % decrease in absolute demand for natural gas and EL heating oil, the quantities of carbon dioxide and nitrogen oxides emitted also fell slightly. Emissions of sulphur dioxide result primarily from the consumption of light heating oil. In phases of extreme gas prices in summer/autumn 2022, the main energy supply had to be switched from natural gas to heating oil for economic reasons. This is very regrettable from an ecological point of view due to the significantly increased emission levels of sulphur dioxide, but was economically unavoidable. We hope that similar measures will not be necessary again in the future and are working on an energy concept for the future.

Exhaust air from production

Rudolf GmbH has two modern exhaust air purification plants, one of which operates according to the principle of regenerative thermal oxidation (RTO). The second plant (ALURA) consists of a cryocondensation plant, an exhaust gas scrubber and a 3-bed activated carbon plant.

The RTO burns the exhaust air from the production hall. C. A back-up firing, usually natural gas, is required to start and operate the plant. In the case of high organic loads, the operating temperature can also be maintained without a back-up firing system.

The ALURA has the following structure: In the cryocondensation system, solvents are separated from the exhaust air using cryogenic liquid nitrogen, thus effectively reducing the load on the downstream system components. The packed bed scrubber washes out polar substances in particular from the exhaust air. Of the 3-bed activated carbon system, 2 beds are in operation and the third is in regeneration or standby. The switchover is automatic. During regeneration, solvents on the activated carbon are desorbed by means of water vapour and the activated carbon is then dried. As planned, the officially prescribed repeat emission measurements were carried out at ALURA at the end of October 2021. The measurement programme, which was coordinated with the District Office, comprised a large number of parameters under various operating conditions. An external institute with special immission control approval was on site for several days to carry out the measurements. Among other things, the total organic carbon content and a large number of organic substances were determined in the waste gas. The latter are primarily substances that are used as raw materials at Rudolf GmbH but are not present in the products after chemical conversion. The measurement results confirmed the efficiency of the plant. The comprehensive measurement report was handed over to the district administration at the beginning of 2022.

The next emission measurements at ALURA are scheduled for autumn 2024.

The RTO is currently out of operation. The exhaust air flows from production hall C were transferred to ALURA. The subsequent emission measurements at the ALURA proved that this plant can also handle the additional exhaust air flow from the C hall while complying with the limit values. This has also been confirmed by the longer-term operating experience. The emission measurements at the RTO will be repeated after the plant has been put back into operation.

5 Environmental policy

The management of Rudolf GmbH assumes responsibility for the environmental policy and is committed to implementing the environmental goals.

Since 2002, the quality and environmental management systems have been managed in a joint integrated management system. With this system, we ensure that the legal regulations and official requirements are complied with and that environmental goals are continuously developed.

The focus of all efforts is on:

Products,

whose environmental behaviour and ecotoxicological properties are an integral part of the product quality.

Production facilities,

where the environmental impact is minimised and the best possible precautions are taken in terms of occupational and plant safety.

Employees,

who are environmentally and safety conscious in working towards the fulfilment of the goals.

Managers,

who exemplify environmental policy.

Public relations and contacts with authorities,

built on partnership and ongoing dialogue.

In detail, this means:

Products

The aim is to ensure that all Rudolf products do not contain any components that are considered carcinogenic, harmful to fruit or genetic material or that accumulate in nature. Due to stricter limits for formaldehyde, the labelling of a small group of products has changed without any changes in the formulation: These few flame retardant products and products for textile high-finishing must currently be labelled with "May cause cancer". Although the levels of formaldehyde have been minimised across the industry, they cannot yet be reduced to zero. Research and development work on this is ongoing. In textile high-finishing, which gives textiles easy-care properties, precisely these properties can only be achieved with formaldehyde-based ingredients.

Every customer receives all the necessary information to ensure that the intended use of a Rudolf product does not pose a risk to people or nature. In the development and market testing of new products, the entire chain is considered, from the procurement of raw materials to manufacturing conditions, storage, transport, use and disposal. Textiles are often referred to as people's "second skin". For this reason, the human-toxicological and ecological behaviour of textile auxiliaries is of particular importance.

Up-to-date information on SVHC substances is always available for customers.

5 Environmental policy

Production

For Rudolf GmbH, quality, environmental protection and safety are self-evident components in the organisation of a chemical company and for the operation of a chemical production plant. The further development of all measures of environmental protection and safety is not based on spectacular individual measures, but on a constant improvement of the processes of everyday operations. The principles for new and further development of products and processes as well as for all plant improvements are:

- Minimisation of production-related waste
 water
- Minimisation of air and noise emissions
- Minimal waste
- Reuse of containers (drums, containers)
- Best possible precautions in occupational safety and plant safety
- State-of-the-art technical equipment

Employees

For Rudolf GmbH, environmentally and safetyconscious employees are the basic prerequisite for fulfilling these goals. To this end, there is an open dialogue with all employees, combined with ongoing training and further education. Consequently, every employee is expected to behave in a committed and responsible manner. Employees must understand environmental protection and occupational safety as part of their quality-oriented work. This builds on managers who are role models and exemplify the environmental policy.

Public

In order for Rudolf GmbH to be successful on the international markets with its employees and products, a partnership and constant dialogue with licensing authorities and the public is necessary. Compliance with legal regulations is a matter of course. Only by acting on one's own responsibility can the sometimes very detailed legal regulations and requirements be implemented in everyday life. The environmental management system also fulfils the principles of the "Responsible Care" programme - a worldwide initiative of the chemical industry. Consequently, the company is also a participant in the "Bavarian Environmental and Climate Pact" of the Bavarian industry and Bavarian state government. In spring 2023, Rudolf GmbH was awarded a golden certificate by State Minister Thorsten Glauber for more than 15 years of participation in the Environment and Climate Pact.



6 Contact

Christoph Andrée Director Environment, Health & Safety

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7 Erläuterungen

CSB

Chemical oxygen demand; a measure of the sum of all organic substances in water, including those that are difficult to break down. COD indicates how much oxygen is needed for the complete oxidation of organic substances by chemicals.

BSB₅

Biochemical oxygen demand; a measure of the sum of all biodegradable organic substances in water. The BOD indicates how much dissolved oxygen is required in a certain time for the biological degradation of the organic wastewater constituents; it is usually determined for the period of 5 days and is therefore called BOD5.

AOX

Abbreviation for adsorbable organic halogen compounds; sum parameter that records all adsorbable organic halogen compounds in waste water.

MBAS

Methylene blue active substance (DIN 38 409, Part 23); group-specific analysis method, by which essentially anionic surfactants are detected.

BIAS

Bismuth-active substance (DIN 38 409, Part 23); group-specific analytical method by which essentially non-ionic surfactants of the polyglycol ether type are detected.

TA Air

Administrative regulation on the Federal Immission Control Act on air quality control. Contains guideline values for immissions as well as numerous substance- and plant-related emission values, furthermore: requirements for the determination of immission parameters, measurement and monitoring of emissions, as well as for the remediation of old plants.

Emissions

The gaseous, liquid or solid substances released into the atmosphere by an installation or technical process; also noise, vibrations, light rays and heat as well as liquid and solid substances which do not enter the atmosphere but are released into other areas of the environment.

Immissions

Air pollutants or radiation affecting the environment.

CO,

Carbon dioxide

SO₂

Sulphur dioxide

NOx

Nitrogen oxides

SVHC-Substances

Substances of Very High Concern (SVHC) are chemical compounds or part of a group of chemical compounds identified under the REACH Regulation as having particularly hazardous properties. These substances can have serious effects on human health or on the environment. The listing of a substance as SVHC by ECHA (European Chemicals Agency) is the first step for the authorisation and restriction of chemicals. The first list of SVHCs was published on 28 October 2008 and has since been supplemented every six months at the end of June and the end of December. For identified SVHCs, special information obligations apply within the supply chain.



ZERTIFIKAT

Die Zertifizierungsstelle der TÜV SÜD Management Service GmbH

bescheinigt, dass das Unternehmen

Rudolf GmbH

Altvaterstr. 58-64 82538 Geretsried Deutschland

für den Geltungsbereich

Entwicklung und Produktion von chemischen Produkten insbesondere für die Textilindustrie

ein Qualitäts- und Umweltmanagementsystem eingeführt hat und anwendet.

Durch Audits, dokumentiert im Auditbericht (Auftrags-Nr. 70010046), wurde der Nachweis erbracht, dass diese Managementsysteme die Forderungen folgender Normen erfüllen:

ISO 9001:2015 ISO 14001:2015.

Dieses Zertifikat ist gültig vom **05.08.2020** bis **04.08.2023**. Zertifikat-Registrier-Nr.: **12 100/104 3047 TMS**.

Product Compliance Management München, 05.08.2020



ERTIFIKAT 🔶



Auszeichnung in Gold

Die

Rudolf GmbH

hat sich zum fünften Mal in Folge mit qualifizierten freiwilligen Umweltleistungen am Umweltpakt bzw. am Umwelt + Klimapakt Bayern beteiligt und erhält in besonderer Anerkennung und Würdigung dafür die Urkunde in Gold verliehen.

München, den 19. April 2023

Thorsten Glauber, MdL

Bayerischer Staatsminister für Umwelt und Verbraucherschutz



URKUNDE

Mit qualifizierten freiwilligen Umweltleistungen hat sich die

Rudolf GmbH

am Umwelt + Klimapakt Bayern beteiligt und erhält dafür als Dank und Anerkennung diese Urkunde. Die Teilnahme am Umwelt + Klimapakt Bayern erstreckt sich über einen Zeitraum von drei Jahren bis einschließlich 09.12.2023.

München, den 09.12.2020

Thorsten Glauber, MdL

Bayerischer Staatsminister für Umwelt und Verbraucherschutz

