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Supplier Manual

Responsible Plastics Policy

Version 1.1
September 2022



Sustainable Plastics Policy

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1. Introduction

Plastic as a material plays a major role in modern society, as can be seen within Action's product range. From household goods to multimedia and decoration, plastic can be found throughout our assortment.

Unfortunately, the benefits brought by innovative, lightweight, durable plastic products that help reduce carbon emission have recently been overshadowed by realisation on how extensive the negative effects of plastic (waste) pollution on the (marine) environment and society actually are when not recycled properly.

Therefore, it is necessary to address the challenges of plastics use by reducing the diversity of materials used for the same applications, scaling up effective collection and recycling of plastic products and increasing the use of recycled content. Only then can plastics deliver added value to a more sustainable, new circular economy and help in realisation of the UN Sustainable Development goals.

2. Vision

While Action provides a wide range of useful and affordable products to the customers, we also acknowledge the environmental and social responsibility we have by introducing large quantities of plastic into the market.

We will engage with our suppliers and other supply chain stakeholders towards structural reduction of the use of virgin plastics in our products by setting targets for recycled plastic content.

As a part of our commitment, we will also raise public awareness towards more responsible use and disposal of our plastic products and engage with our stakeholders in search for best practices.

We recognize the challenge that lay ahead of us and the fact that our journey towards more responsible use of plastics has just begun. Action is determined to follow through and report on commitments set in this policy.

3. Scope

This policy applies to all products containing plastics. For defining whether material qualifies as plastic the following definition from Single Use Plastic Directive EU 2019/904 applies: "'plastic' means a material consisting of a polymer to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified".

Polymers used in semi(liquid) applications such as paints, inks, adhesives, foams, sealants, fillers and other like products are out of scope of this policy with the exception of added microplastics.ⁱ

Plastic packaging and safe use of chemicals in general are also excluded from the scope of this policy as the commitments related to the responsible packaging and chemical use have been defined in our packaging and chemical policies.

4. Legal Compliance

Legal compliance with legal acts listed in appendix 1 means that the supplier complies with the provisions that are directly applicable to plastic products. If below mentioned legislation also applies to other domains of Action business practice, it is implied that the compliance with other requirements have been addressed separately.

As the plastic related issues reach beyond the scope of specific legal acts, to comply with all sustainability requirements, it is important for Action and its suppliers to understand the content and implications of international, regional and national sustainability policies related to plastics.

As we strive to comply with all the requirements of the EU legislation on plastics. We expect all suppliers dealing with plastic products to take responsibility to stay informed on current and any upcoming legislation.

ⁱ EFSA Q&A on upcoming microplastics restrictions.

5. Policy commitments

Below we outline our policy commitments. We are aware of the complexity of these commitments and therefore recognize a step-by-step approach is needed. In each update of this policy our commitments and planning will be further specified.

1. Compliance and reporting

Most direct legal provisions in relation to plastic product apply either to a specific geographic area and/or a specific product group. In the context of this policy, the Action overall compliance is directed at the goals and provisions of the European Circular Plastics Policy with country or product specific commitments where applicable.

Reporting on our plastic commitments will become part of the Action Sustainability Program (ASP) reporting.

2. Resource use & design

Less complexity

Action strives towards less complexity in the use of plastics for product groups that generate the most household waste. The shorter the predicted life span of the product, the more important recyclability of the product becomes. Depending on the expected duration of use different policy commitments will apply, unless product specific legislation dictates otherwise:

- *Single use products*

The use of plastic should be avoided. For applications where alternative materials are not available, one of the commonly recyclable plastics should be used. Where possible reusable alternatives will be developed.

- *Medium long life span products*

One of the commonly recycled plastic should be used and designed with recycling in mind. If an item contains multiple components made from different materials, they should be easy to separate upon disposal.

- *Durable items*

Durable products should be designed in a way that enables repair and/or refurbishing as well as recycling at the end of life.

Recycled content

Action will contribute to creating market for recycled material and promote use of post-consumer recycled content. Recycled plastic content targets for product have been specified in our Action targets.

Biobased and biodegradable plastics

Action recognises the circular potential of alternative plastic feedstocks derived from sustainably sourced biomass. The application of biobased plastics in products depends on the LCA quantification of potential environmental impact reduction and compatibility with the existing recycling systems.

The choice for biodegradable or compostable plastics will depend either on the existence co-benefit, such as in a case of compostable garbage bags enabling organic waste collection, or specific national or local legal provisions dictating use of certain certified compostable plastics. Where biodegradability is not a legal requirement, or does not have a specific function, we require biobased or recycled plastic.

Microplastics

The negative effects of microplastic pollution can no longer be overlooked. Ahead of upcoming legislation, Action will identify and ban additionally added microplastics from all product groups where possible.

For product groups known for their contribution of unintentional release of microplastics such as from textiles or tires, Action is committed to work with suppliers and stakeholders on a mitigation strategy.

3. Waste management & consumer awareness

In-house waste management

Actions will identify potential non-packaging related plastic waste and will dedicate to diverting such waste from incineration into recycling.

EPR and waste disposal options

For all plastic containing products other than packaging for which an Extended Producer Responsibility obligation exists, Action will offer in-store collection possibilities.

Consumer awareness

Action will develop continuous communication to raise awareness towards customers about responsible use, repair, refurbishment and recycling of various plastic products including: Single use, Medium long life span and Durable plastic products.

4. Partnerships and innovation

Our commitment to sustainable use of plastic requires close cooperation with stakeholder within and outside our current supply chain. Action will therefore engage with multiple stakeholders including our suppliers and recyclers to explore possibilities to turn plastic waste streams into material resource for (our) products.

6. Overall targets

1. Compliance and reporting

2023

Performance on plastic policy commitment is a part of ASP Product reporting.

2. Resource use

2025

Overall target of minimum 35% third party verified PCR content in all non-food related product categories for which no legal restrictions exists (such as in the case of toys).

2030

Overall target of minimum 60% third party verified PCR content in all product categories for which no legal restrictions exists (such as in the case of toys and some food contact products).

2030

For products containing biobased plastics a LCA demonstrating environmental benefit is in place.

2030

All disposable and reusable plastic products are recyclable.

3. Waste management and consumer awareness

2023/24

Consumer awareness raising campaign is launched.

2025

Collection facilities for EPR products other than packaging in all Action stores.

4. Partnerships and innovation

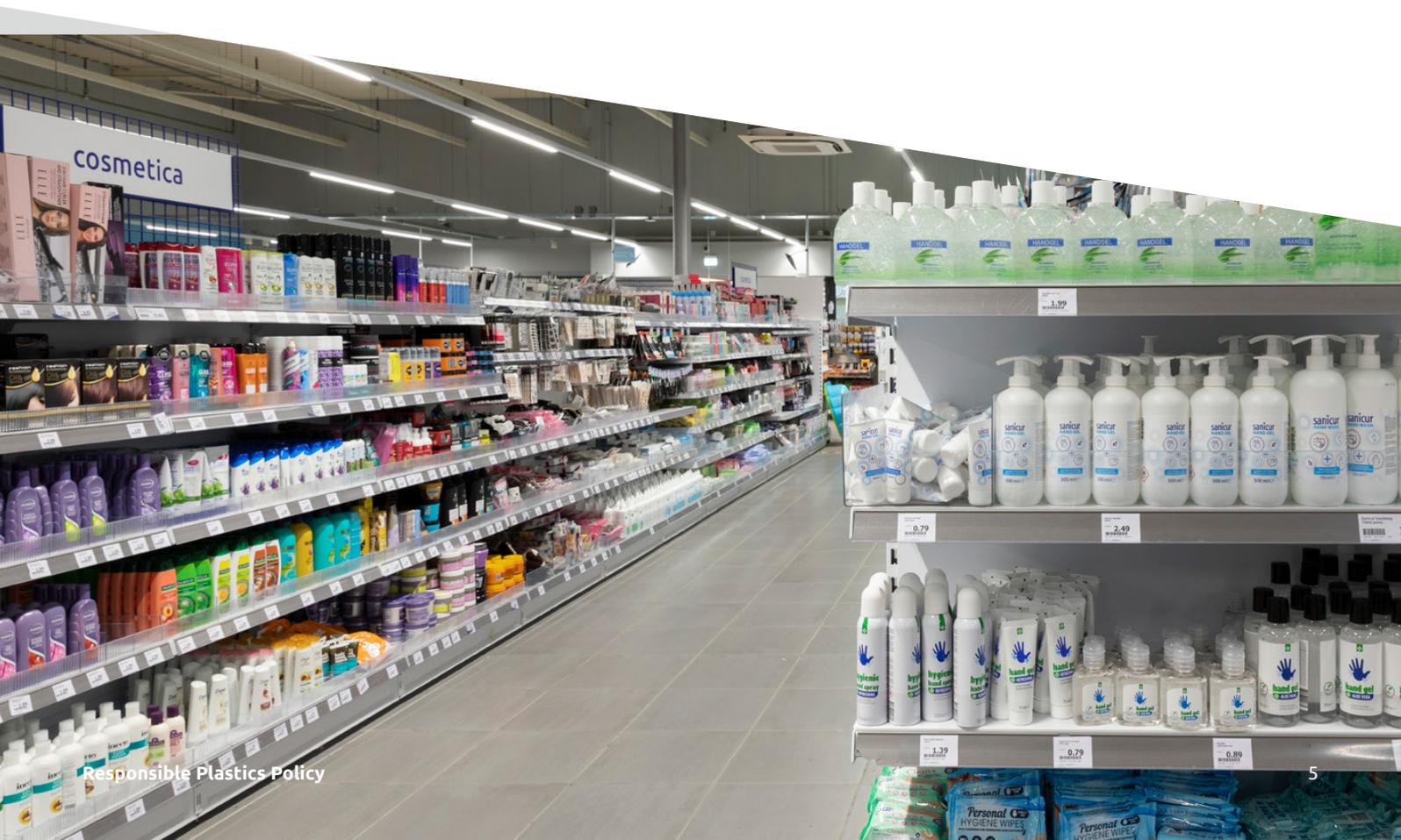
2023

Research the possibilities to work with external stakeholders and/or suppliers in making our plastic waste part of circular sourcing for new products.

7. Action specific commitments

Action understands that plastics used in our various product categories, requires a specific approach and commitment.

In addition to national legislation obligations, we will engage with our suppliers for each category containing plastic products to set specific targets to work towards.



Appendix

1. Legislation

Description	Scope	Where	Type of requirement
<i>REACH Regulation</i>	All products	EU	Chemical purity criteria, including absence of SVHC's and cadmium. Compliance must be demonstrated with test report issued by an accredited lab.
<i>RoHS Regulation</i>	Electrical and electronic equipment	EU	Chemical purity criteria. Compliance must be demonstrated with test report issued by an accredited lab.
<i>Toy Safety Directive</i>	Toys for children under age 14	EU	Technical purity criteria. Compliance must be demonstrated with test report issued by an accredited lab. and official technical dossier.
<u>Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food</u>	Food contact materials including household goods and food service disposables	EU	Safety criteria related to chemical purity, sensory properties and labelling. Compliance must be demonstrated with test reports issued by an accredited lab.
<u>Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food</u>	Food contact materials including household goods and food service disposables	EU	Documented and implemented Quality Assurance System based on HACCP risk assessment must be in place. Compliance must be demonstrated with GFSI recognised certificate and/or third party audit report.
<u>Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food</u>	Food contact materials including household goods and food service disposables	EU	Chemical purity criteria and migration restrictions. Compliance must be demonstrated with test reports issued by an accredited lab and a declaration that the product only contains substances mentioned in the positive list. European producers and importers supplying goods from outside of Europe should provide a DoC – (Declaration of Conformity) in accordance with the standard format in Annex IV of the Plastics Regulation.
<u>Regulation (EC) No 282/2008 on recycled plastic materials and articles intended to come into contact with foods and amending Regulation (EC) No 2023/2006</u>	Food contact materials including household goods and food service disposables	EU	Chemical purity and quality assurance requirements. Compliance must be demonstrated with test reports issued by an accredited lab and a declaration of origin indicating that the recycled material originates from an EFSA approved recycling facility.
<i>SUP Directive and all national implementation acts</i>	Food service disposables not being packaging, personal care items, balloons	EU	Marking requirements for beverage cups, wet wipes and woman hygiene items. Recycled content requirements for beverage bottles (25% for disposable PET bottles as of 2025 and 30% for all disposable plastic beverage bottles as of 2030). Compliance must be demonstrated with third party certificate.
<i>Vlarema 7</i>	Garbage bags	Belgium	Recycled content requirements (80% of which min. 50% PCR content as of 2021 and 100% of which min 50% PCR content or all disposable plastic beverage bottles as of 2025). Compliance must be demonstrated with third party certificate.

Appendix

2. Policy documents

Description	Scope	Geographical area
<i>UNEP resolution on marine plastic debris and microplastics</i>	All	All
<i>EU Circular Plastics Strategy</i>	All	EU
<i>Circular transition plan for plastics</i>	All	Netherlands
<i>Action Plan Biobased Plastics</i>	All	Netherlands

Definitions

<i>ASP</i>	Action Sustainability Program
<i>EPR</i>	Extended Producer Responsibility
<i>LCA</i>	Life Cycle Analysis
<i>PCR</i>	Post-Consumer Recycled

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