

## Responsible Plastics Policy

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## 1. CONTEXT

Plastic as a material plays a crucial role in modern society, as evident within Action's product range. From household goods to multimedia and decoration, plastic is a fundamental component across our assortment.

Unfortunately, the benefits brought by innovative, lightweight, durable plastic products have been increasingly overshadowed by the significant negative impact of plastic (waste) pollution have on the environment and society when not recycled properly.

Therefore, it is necessary to address the challenges by encouraging the use of fewer types of plastic for the same purpose to improve recyclability, scaling up effective collection and recycling of plastic products and increasing the use of recycled plastic content or substituting them with renewable alternatives.

By addressing these concerns, plastics can deliver added value to a more sustainable circular economy and contribute to the realisation of the UN Sustainable Development goals.

## 2. VISION

While Action offers a wide range of useful and affordable products that contain plastics, we acknowledge the environmental and social responsibility that comes along with it.

We are committed to engaging with our suppliers and other supply chain stakeholders towards a structural reduction of the use of virgin plastics by setting targets incorporating recycled plastic content in our products and also optimizing the use of our plastic waste streams.

We recognize the challenge that lies ahead of us and understand that our journey toward more responsible use of plastics has just begun. Action is determined to follow through and report on the progress of the commitments outlined in this policy.

### 3. SCOPE

This policy applies to all products containing plastics except for A-Brands. 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, where compliance with the latest legislative requirements is mandatory (see appendix 1).

EFSA Q&A on upcoming microplastics restrictions

Additionally, plastic packaging and the safe use of chemicals are excluded from the scope of this policy, as these commitments are defined in our packaging and chemical policies.

### 4. LEGAL COMPLIANCE

Compliance with legal acts listed in appendix 1 requires the supplier to comply with the provisions that are directly applicable to plastic products. If the 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 challenges extend beyond the scope of specific legal acts, 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 for staying informed on current and any upcoming regulations.

## 5. POLICY COMMITMENTS

We are aware of the complexity of our 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 on plastic products apply to a specific geographic area and/or a specific product group. In the context of this policy, Action's overall compliance aligns with the goals and provisions of the European Circular Plastics Policy with country or product specific commitments where applicable.

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

### 2. Resource use & design

#### Less complexity

Action aims to reduce the complexity of plastics in 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 article lifespan, 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 (Table 1). Where possible reusable alternatives will be developed.

- **Medium life span products (Less than 1 year)**

One of the commonly recycled plastics should be used and the product 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 (More than 1 Year)**

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

The table below serves as a guide to selecting plastics with higher recycling, supporting the growing demand for recycled plastic in the market.



**Plastics are rated based on their recyclability:**

- ✓ **Widely Recycled:** These plastics are commonly collected by municipal recycling systems and have established markets for processing into new materials e.g.: PET, HDPE etc.
- **Recyclable in some regions:** These plastics can be recycled, but their recycling depends on local infrastructure, sorting capabilities, and market demand e.g.: LDPE, ABS etc.
- ✗ **Limited recyclability:** These plastics are technically recyclable, but rarely get recycled due to economic, technological, or contamination challenges e.g.: PVC, PS

Suppliers should prioritise highly recyclable plastics and reduce the use of plastics with low- recyclability (shown in table as — and ✗) wherever possible without compromising product quality or durability. Recycling rates may change over time due to technological advancements and improvements in recycling infrastructure, so staying informed is crucial.

<i>Plastic Type</i>	<i>Recyclability</i>	<i>Product Examples</i>
PET/ Polyester Fibre	✓	Bottles, Food containers, Clothing
HDPE	✓	Laundry, detergent and personal care bottles
PVC	✗	Inflatables
LDPE	—	Bin liners, carrier bags and films
PP	✓	Packing tape, straws and microwave safe trays
PS	✗	Foam box, protective packaging
ABS	—	Toys, Extension leads
PUR	✗	Foam packaging, footwear
PA/Nylon	—	Clothing, Food packaging, Fishing line
PC	—	Lenses, storage boxes
PLA (bioplastic)	✗	Cutlery, Toys
EVA	✗	Footwear, Foam packaging
PMMA/Acrylic Fibres	—	Clothing, tents

Table 1: Recyclability of Plastic Types

### **Recycled content**

Action will contribute to creating a market for recycled material and promote use of post-consumer recycled content. Recycled plastic content targets for products have been specified in our Action targets to further our ambition to reduce our reliance on virgin plastics.

### **Bio-based and biodegradable plastics**

Action recognises the circular potential of alternative plastic feedstocks derived from sustainably sourced biomass. The application of bio-based plastics in products depends on the life cycle analysis (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, for example: compostable garbage bags enabling organic waste collection, or specific national or local laws requiring the 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. With the new regulation in place, Action identifies and bans additionally added microplastics from all product groups as mandated by the latest regulation.

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

## ***3. Waste management & consumer awareness***

### **In-house waste management**

Action 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 monitor the requirements for collection initiatives related for such products and implement if mandated.

### **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 stakeholders within and outside our current supply chain. Action engages 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**

Target Scope: Products with a cumulative plastic content exceeding 50,000 kg in receivals over a calendar year.

Exclusions:

- A-Brands
- E-Commerce (E-Comm) articles
- Stock Lot articles
- Microplastics in products (addressed separately under regulatory compliance)
- Products subject to regulatory or safety restrictions, such as:
  - o Food contact materials
  - o Toys and Children's products
  - o Medical devices and healthcare products
  - o High-performance or critical-use applications
  - o Flammable products

#### ***1. Compliance and reporting***

2024: Performance on plastic policy commitment is a part of ASP Product reporting

#### ***2. Resource use***

2025: Overall target of minimum 35% recycled content by weight in all non-food related product categories. The scope of this target is exclusive to Action-owned brands and our imported products.

2030: Overall target of minimum 60% recycled content by weight in all non-food related product categories. The scope of this target is exclusive to Action-owned brands and our imported 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***

Ongoing: Developing an effective approach to engage with our consumers to increase awareness on waste management.

Ongoing: Collection initiatives for EPR products other than packaging where applicable.

### ***4. Partnerships and innovation***

2023: Working 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.

Action is currently certified under the Global Recycled Standard (GRS) and Recycled Claim Standard (RCS), both developed by Textile Exchange. These standards enable Action to make third party-certified recycled claims, verified through a chain-of-custody volume reconciliation process.

To ensure compliance with the upcoming Green Claims Directive, we also aim for our suppliers and their supply chains to obtain certification under these or similar schemes which will ensure future compliance.

## APPENDIX 1

### 1. Legislation

<i>Description</i>	<i>Scope</i>	<i>Where</i>	<i>Type of requirement</i>
REACH Regulation	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
RoHs Regulation	Electrical and electronic equipment	EU	Chemical purity criteria. Compliance must be demonstrated with test report issued by an accredited lab.
Toy Safety Directive	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
Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food	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.
Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	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.
Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food	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.

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	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.
SUP Directive and all national implementation acts	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.
Vlarema 7	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.
Microplastics Regulation (ECHA Proposal)	Products intentionally releasing microplastics during use (e.g., cosmetics, detergents, paints)	EU	Ban on intentional use of microplastics in products (phased deadlines. Compliance must be demonstrated through reformulated product testing and documentation.
French AGECL Law	All products	France	Prohibits certain single-use plastics (e.g., cups, plates, straws). Also requires labelling for recyclability and environmental impact. Compliance must be demonstrated with certification and documentation.
Extended Producer Responsibility (EPR) Scheme	Textiles and potentially other product groups in the future	EU	Producers are responsible for the end-of-life management of products (e.g., collection, recycling). Targets vary by country; compliance requires financial contributions and reporting through EPR systems in member states.

## 2. Policy documents

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

## DEFINITIONS

ASP	Action Sustainability Program
EPR	Extended Producer Responsibility
LCA	Life Cycle Analysis