

żabka

Ecodesign Policy



Żabka Polska sp. z o.o.
ul. Stanisława Matyi 8,
61-586 Poznań

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PURPOSE	This Ecodesign Policy sets forth the rules for the designing of packaging intended for own brands and point-of-sale materials, including the main criteria and detailed guidelines for each criterion.

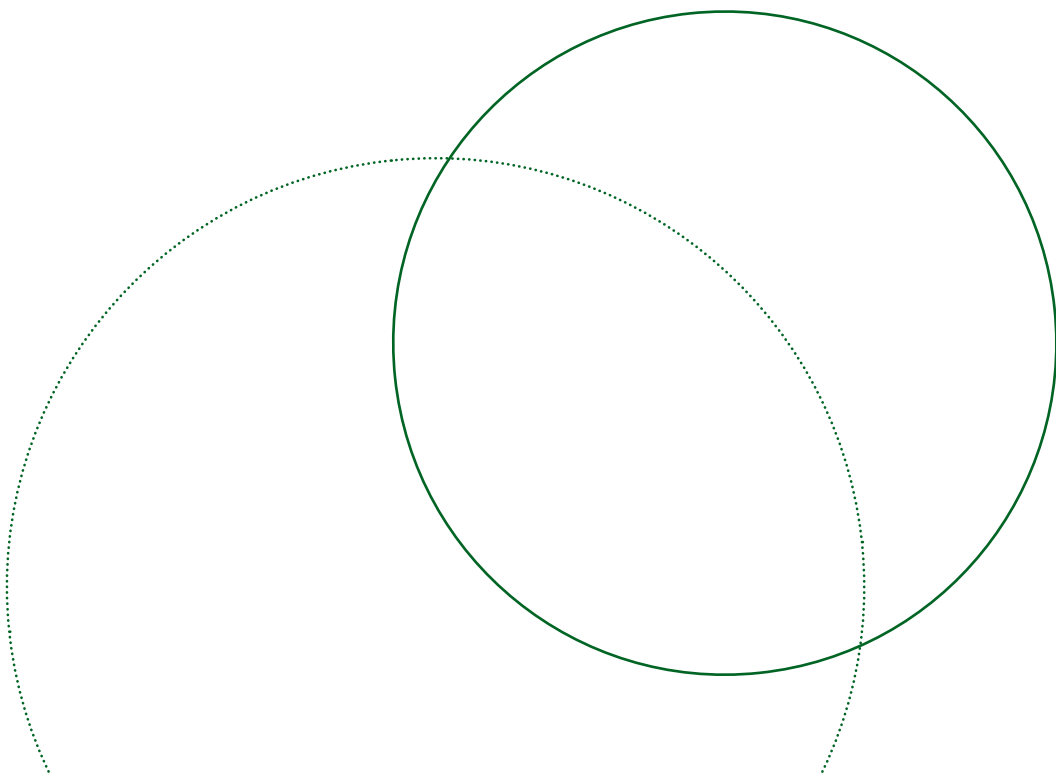


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Introduction

Żabka Polska strategic commitment is to create conditions for a green and sustainable living for everyone, every day. This is why one of the core pillars of our Responsibility Strategy is the Green Planet. Żabka focus on actions that allow us to minimize our environmental impact across the whole value chain to protect Green Planet. **Our goal is to have 100% of own-brand packaging that is recyclable or recycled by 2025.** To achieve this goal, we must learn how to design processes and packaging in a way that ensures sustainable and economically reasonable resource management. As a responsible business, we want to use ecodesign to make sure that today's waste becomes a resource that shapes the future. This Ecodesign Policy is meant as a reference point for clear rules on designing and selecting appropriate resources for own-brand packaging and point-of-sale materials.

Art. 1. Policy purpose and scope

1. This Ecodesign Policy sets forth the rules for the designing of own-brand packaging and point-of-sale materials applicable in Żabka Polska.
2. This procedure applies to all employees, partners, as well as current and future business partners cooperating with Żabka Polska.

Art. 2. Definitions and abbreviations

1. **Ecodesign Policy** —————→ this Ecodesign Policy,
2. **Żabka Polska, Company** —————→ Żabka Polska sp. z o.o.,
3. **Employees** —————→ all persons employed by Żabka Polska under an employment relationship, regardless of the type of employment contract and working time,
4. **Partners** —————→ persons providing services to Żabka Polska or performing other tasks under a cooperation contract (i.e. civil-law contract, including a services contract, mandate contract or a specific-work contract) or appropriate powers of attorney,
5. **Business Partner** —————→ a natural or legal person having a business relation with Żabka Polska, meaning product suppliers and service providers,
6. **Own-Brand Products** —————→ products offered to consumers under the Żabka Polska brand, understood as products manufactured by a given supplier, with qualities specified by Żabka Polska, put in a packaging specified by Żabka Polska and bearing a trademark specified by Żabka Polska, with all intellectual property rights to such a trademark held by Żabka Polska,
7. **Point-of-Sale Materials** —————→ advertising materials and products such as bags, napkins, cutlery and posters offered to Franchisees by Żabka Polska,

- 8. **Packaging** → understood not only as individual product packaging, but also bulk packaging, transport packaging and any other packaging used in the distribution or sales processes,
- 9. **HDPE** → high-density polyethylene,
- 10. **LDPE** → low-density polyethylene,
- 11. **PP** → polypropylene,
- 12. **PVC** → polyvinyl chloride,
- 13. **PS** → polystyrene,
- 14. **PET** → polyethylene terephthalate,
- 15. **EVOH** → ethylene / vinyl alcohol,
- 16. **OPP** → oriented polypropylene,
- 17. **BOPP** → biaxially-oriented polypropylene.

I Art. 3. General background of policy

Żabka Polska has a clear goal – to have 100% of own-brand packaging that is recyclable or recycled by 2025. Our actions are based on the current EU and domestic regulations. The **Single-Use Plastics Directive** includes a ban on the use of single-use plastics, introduction of new models of beverage containers (the cap connected to the bottle) and the obligation of incorporating recycled material in the packaging used (targets: 25% by 2025 and 30% by 2030). Moreover, a **plastics tax** has been introduced, which is a fee to be paid by EU Member States for each kilogram of non-recycled plastic waste in a given year. It has been applicable since January 2021. There are also other domestic regulations underway as part of the Polish Deal. The Polish government has indicated that there are talks on the Circular Economy and a system of Extended Producer Responsibility, and announced that a container deposit scheme will be introduced.

I Art. 4. General rules

Ecodesign is governed by four main criteria: loop, reduce, simplify and communicate. The loop criterion is mainly about selecting materials carefully and choosing those that are recycled or recyclable. The **reduce** criterion is based on the reduction of the mass and volume as well as the use of secondary resources and reusable packaging. The **simplify** principle means that packaging should have an ergonomic, optimal shape, ensuring that the packaging can be fully emptied. The color of the packaging is also crucial; contrasting colors and soot-based colorformers should be avoided. Another recommendation is to avoid using solutions that make recycling harder, such as durable, irremovable labels made of a different material. The last thing to remember is to **communicate**. When designing the packaging, remember to incorporate the right symbol or pictograph that would increase the chances of material recovery. A unified labeling system informs the consumer what material was used to make the packaging and what fraction it should be placed in after consumption.

Our goal is to ensure that all packaging material is 100% recyclable or recycled. To achieve this goal it is necessary to include these principles in the standards relating to the packaging of own-brand products and point-of-sale materials.

I Art. 5. Detailed rules

I.

Loop:

- the use of only one type of material or a material combination that is compatible with recycling (in accordance with the rules included in table 2),
- avoidance of non-recyclable materials (table 1 RED-STOP and AMBER-HOLD),
- use of materials covered by a sort-and-reuse system and which provide recycling viability (table 1 END AIM),
- maximization of the use of recycled materials for packaging (table 1 END AIM),
- use of biodegradable packaging for products only when the processing of such packaging is a real option, e.g., with an organic waste stream intended for composting.

Table 1 Recommended and not recommended materials for packaging

RED – STOP	AMBER – HOLD	GREEN – PREFERRED	END AIM
Not recommended / limited	Until appropriate recycling technology becomes available	Recycling-friendly	Participates in closed-loop recycling
<ul style="list-style-type: none"> • PS/EPS Polystyren • PU / PA • PVC • Polycarbonate • Cellophane • Multi-material packaging • Laminates (combinations of various polymers) • Black colorformer 	<ul style="list-style-type: none"> • Pigmented materials • Compostable materials with EU certificates • Barrier paper 	<ul style="list-style-type: none"> • PET • PP, OPP, BOPP • PE, LDPE, HDPE • Aluminum • Glass • Steel • Paper 	Recycled packaging: <ul style="list-style-type: none"> • rPET • rPE • rPP • Alu • Paper • Reusable packaging

Table 2 Recommended and not recommended combinations of plastics for packaging

Packaging material		Main material					
		HDPE	LDPE	PP	PVC	PS	PET
Additional material	HDPE	1	1	2	2	3	3
	LDPE	1	1	2	2	3	3
	PP	2	2	1	2	3	3
	PVC	4	4	4	1	4	4
	PS	3	3	3	3	1	4
	PET	3	3	3	3	4	1
	EVOH	2	2	2	2	4	2

1 acceptable, does not affect the properties of regranulate

2 possible, the effect on the properties of regranulate depends on the percentage of the additional material used

3 admissible, on the condition that sorting is possible

4 inadmissible, may damage regranulate

II.

Reduce:

- the reduction of the amount of packaging material used to a minimum,
- the reduction of the weight of packaging by adjusting the appropriate material,
- the reduction of the number of packaging layers to a minimum,
- the avoidance of unnecessary elements,
- the maximization of secondary materials incorporated in packaging,
- the verification of the quality of secondary materials, including the full specification of resources' and materials' functional properties as well as the recycler's certification,
- the designing of reusable packaging.

III.

Simplify:

- the designing of packaging with a simple shape,
- the avoidance of dark colorformers,
- the avoidance of complex packaging closures that make recycling harder,
- the attachment of the cap of plastic packaging to the main part of the packaging,
- the avoidance of labels, glue, coatings and other elements that are not recyclable,
- the use of water-soluble glue for labels,
- the use of labels made of the same material as packaging.

IV.

Communicate:

- the use of symbols indicating the right fraction for the waste generated by the packaging,
- the creation of communication available also for people with disabilities.

| Art. 6. Policy update and review

1. The Packaging Innovation & Development Expert ensures that the Ecodesign Policy complies with generally applicable laws and verifies potential irregularities in the enforcement and implementation of the Policy.
2. The Ecodesign Policy is periodically reviewed and – if necessary – updated accordingly to ensure that it complies with applicable legal regulations.
3. The Policy is reviewed and updated by the Packaging Innovation & Development Expert at least once every 12 months.

| Art. 7. Final provision

1. The Ecodesign Policy was accepted under the resolution of the Company's Management Board on 15 October 2021.
2. The Ecodesign Policy enters into force on 16 October 2021.

