#### March 2024

# **Universal Store**

# Sustainable Packaging Policy

#### Our Commitment

Universal Store is a member of the <u>Australian Packaging Covenant</u> (APCO) since December 2021, and we are committed to comply with local and international requirements on packaging use. Universal Store will contribute to achieving the <u>National Packaging Targets</u> set by the Australian Government.

Universal Store is committed to seek sustainable packaging solutions across our value chain, and work with our business partners and customers to adopt more responsible packaging practices.

#### Governance

This policy is approved by our CEO. The policy has been communicated across the business and is integrated in our business processes such as procurement activities. This policy is designed to ensure alignment with the <a href="APCO">APCO</a>
<a href="Sustainable Packaging Guidelines">Sustainable Packaging Guidelines</a>. This policy will be reviewed annually to ensure it remains aligned to industry and regulatory requirements.

### Objectives

Universal Store Packaging Policy aims to achieve the following objectives:

- Comply with regulations and covenant obligations on packaging use;
- Minimise the environmental impact of packaging;
- Use packaging solutions that support a circular economy.

### Our Target

By 2025, 100% of customer bags and online mailers are reusable, recyclable, or compostable.

#### **Our Progress**

- Universal Store phased out of customer single use plastic bags in store, giving customers the option to purchase a reusable certified recycled cotton totes.
- We opted for a 95% recycled LDPE plastic online mailer packaging solution for Universal Store online mailers.
- We transitioned our private brand label product swing tags to recycled card.
- Our Support Office and Distribution Centre has infrastructure to optimise waste sorting and recycling, i.e. cardboard and clear soft plastics.
- We reuse transit boxes packaging in our distribution centre for store fulfilments.

### Key Focus Areas

Packaging must be fit for purpose, provide effective protection for, provide information about the product, and be suitable for end-to-end logistics, warehouse handling and storage. In addition, Universal Store is committed to use the principles laid out in the APCO Sustainable Packaging Guidelines (SPGs) as a guide to inform its packaging choices.

The nature of our packaging requirements lends itself to our business focusing on principles 1, 2, 4, 5, and 10 of the Sustainable Packaging Guidelines as priority focus areas (as underlined below).

Universal Store and its suppliers must observe the below principles when making packaging decisions:

<u>Principle 1. Design for recovery</u>; i.e. ensure that materials in our packaging solutions are selected to optimise reusing, recycling or composting and to reduce consumption of virgin materials.

Principle 2 – Optimise material efficiency; i.e. optimise the volume and weight of packaging.

**Principle 3 – Design to reduce product waste;** i.e. choose packaging that eliminates or reduces product damage and waste.

<u>Principle 4. Eliminate hazardous materials</u>; i.e. minimise the use of hazardous materials and consider alternatives with prints on plastic bags and satchels.

Principle 5. Use recycled materials; i.e. use packaging that contain recycled materials.

**Principle 6. Use renewable materials;** i.e. use packaging that contain renewable materials.

**Principle 7. Design to minimise litter**; i.e. prefer packaging solutions that are designed to be reused or can be recycled in widely available recycling systems.

**Principle 8. Design for transport efficiency;** i.e optimise packaging for pallet utilisation and distribution packaging.

**Principle 9. Design for accessibility;** i.e. ensure the packaging meets customer's expectations for accessibility (ease to open, legible labelling and does not compromise safety or quality).

<u>Principle 10. Provide consumer information on sustainability</u>. The material composition, certification and recycling features clearly to communicate with end users on the best way to use or responsibly dispose of the packaging.

Further details of actions we can take in implementing these principles are provided in Annexe A.

### Supplier engagement

We seek to partner with packaging and private brand suppliers and third-party brands to assist Universal Store deliver on its commitment and achieve our packaging targets. We will do this by:

- Sharing this policy and references to the Sustainable Packaging Guidelines, Recycled Content Guidelines and National Packaging Targets with suppliers and brands,
- Providing specific guidance on packaging operational and sustainability requirements to suppliers and brands,
- Auditing packaging practices to identify opportunities for improvement,
- Engaging business partners that can offer packaging solutions delivering environmental benefits whilst optimising functionality, quality, and value for Universal Store and for our customers,
- Testing alternative packaging for logistics and warehousing operations.

## Training and Education

Universal Store will provide regular training and information sessions to suppliers and team members to help build capacity and support the effective implementation of this policy.

Universal Store is committed to provide relevant information to customers on how to recycle commonly used materials used in our packaging on our Sustainability page.

Our suppliers are encouraged to make accurate and truthful claims on packaging supplied to Universal Store and aligning with the <u>ACCC Making Environmental Claims - Guide for Business</u>.

### Monitoring and Reporting

Universal Store has established packaging usage metrics to monitor performance. We will continue to produce our annual APCO Report and Action Plan to provide transparency and accountability on our packaging sustainability journey. Details of our transition towards alternative packaging are provided in our annual Sustainability Report. Links to our annual APCO and Sustainability Reports are available on our Sustainability page.

#### Continuous improvement

Universal Store commits to regularly review its product and customer packaging items against operational requirements and each of the SPGs Principles by using the Sustainable Packaging Checklist to identify opportunities for improvement and sharing findings with the relevant stakeholders.

Universal Store has systems in place to monitor transit packaging usage across our private brand suppliers and third-party brands. Our Distribution Centre team identifies product deliveries for excessive use of packaging and collects evidence to support ongoing engagement and communication with suppliers and business partners on packaging practices.

#### Procurement

This policy must be referenced in procurement activities.

For new packaging initiatives, Universal Store tender documentation will outline sustainable packaging product specifications based on our operational requirements and in alignment with the SPGs Principles.

Packaging suppliers will be assessed, amongst other supplier evaluation criteria, for their social and environmental credentials, APCO membership and ability to supply products to Universal Store in alignment with the SPGs.

Universal Store will review emerging technologies in the packaging industry for innovations that allow the objectives of this policy to be achieved.

# **Universal Store**

# March 2024 ANNEXE A - ACTIONS WE CAN TAKE & GUIDANCE

# PRINCIPLE	TITLE PRINCIPLE	DESCRIPTION	ACTION WE CAN TAKE & GUIDANCE
Principle 1.	Design for recovery	Ensure that materials in our packaging solutions are selected to optimise reusing, recycling or composting and to reduce consumption of virgin materials.	<ul> <li>Prioritise the use of reusable packaging to extend the life of packaging through multiple uses;</li> <li>Review packaging in the design phase to optimise recycling. This is achieved by using recyclable materials, avoiding contaminants and informing consumers on appropriate options for recovery;</li> <li>Assess whether packaging is recyclable in markets where we operate and identify opportunities to change the design of the packaging to improve recyclability;</li> <li>Consider compostable packaging where appropriate;</li> <li>Ensure that SPGs principles are considered in procurement of both new and existing packaging.</li> </ul>
Principle 2	Optimise material efficiency	Optimise the volume and weight of packaging.	<ul> <li>Without compromising functionality, product protection, safety or customer acceptability, consider avoiding unnecessary packaging and using thinner and lighter packaging where possible;</li> <li>Refer to our Packaging requirements in our New Supplier Agreement Terms and Conditions. We recommend suppliers use one large polybag to line cartons and avoid individually bag individual products <u>unless</u> to reduce tangling for jewellery <u>or</u> avoid damage <u>or</u> soiling of white/beige garments.</li> </ul>
Principle 3	Design to reduce product waste	Choose packaging to eliminate or reduce product damage and waste.	Regularly share examples of good practices or avoidable practices with our suppliers to share knowledge across the industry.
Principle 4	Eliminate hazardous materials	Reduce the use of hazardous materials and consider alternatives with prints on plastic bags and satchels.	<ul> <li>Avoid packaging that contains hazardous substances (ink, pigments) that can be toxic to people, the environment or be contaminants in the recycling process;</li> <li>Refer to our Packaging requirements in the New Supplier Agreement Terms and Conditions. We recommend suppliers avoid tint and print on polybags.</li> </ul>
Principle 5	Use recycled materials	Use packaging that contain recycled materials	<ul> <li>Request stock suppliers to use certified renewable/recycled packaging for card product tags (primary);</li> <li>Request stock suppliers to use certified recycled /compostable* packaging for polybags (secondary) (Refer to Packaging requirements in our New Supplier Agreement Terms and Conditions. *We recommend recycled LDPE polybags as Universal Store does not have the facilities to process large amounts of compostable packaging at present.</li> <li>Request stock suppliers to aim for at least 60% recycled cardboard and paper for transit packaging</li> </ul>

Principle 6	Use renewable materials	Use packaging that contain renewable	<ul> <li>(tertiary);</li> <li>Refer to Packaging requirements in our New Supplier Agreement Terms and Conditions. We recommend recycled cardboard preferably Forest Stewardship Council (FSC) certified.</li> <li>Procure customer packaging solutions made of recycled materials; (Recommended threshold varies based on type of material,</li> <li>Refer to APCO Recycled Content Guide for further guidance)</li> <li>Encourage third party brands to increase the amount of renewable/recycled materials used in</li> </ul>
		materials	their packaging;
Principle 7	Design to minimise litter	Prefer packaging solutions that are designed to be reused or can be recycled in household recycling bins, or when available, through soft plastic return points.	
Principle 8.	Design for transport efficiency	Optimise packaging for pallet utilisation and distribution packaging.	> Refer to "Package Measurement requirements" and "Import Receival T&Cs" for further guidance.
Principle 9	Design for accessibility	Ensure the packaging meets customer's expectations for accessibility (ease to open, legible labelling and does not compromise safety or quality).	
Principle 10	Provide consumer information on sustainability.	feature artwork to communicate with consumers on the best way to use or responsible dispose of their packaging.	<ul> <li>Provide clear information to customers on claims made about environmental attributes of packaging (material sourcing, recycled content), reuse and appropriate disposal.</li> <li>Use and encourage Third Party brands to use the Packaging Recyclability Evaluation Portal (PREP) - an online tool that assesses packaging recyclability in the Australian and New Zealand kerbside or approved drop-off recycling systems.</li> <li>Use the Australia Recycling Label (ARL) for labelling of packaging to help customers to recycle packaging correctly.</li> </ul>