OMRON

OMRON Electronics Pty Ltd Sustainable Packaging Policy and Procedure

Ver. 1.2, 24 May 2021

OMRON Electronics Pty Ltd

1. Purpose

The purpose of this policy and procedure is to reduce the environmental impact of packaging from our standard product range by optimising consumer packaging, increasing recycling and recovery rates and contributing to cleaner recycling streams.

This Sustainable Packaging Policy and Procedure supports the OMRON Group's *Green Procurement Standards*, and applies to the Australian division of the business to help the business meet our obligations as a signatory of the Australian Packaging Covenant.

2. Why do we need a Sustainable Packaging Policy?

OMRON Electronics Pty Ltd is a signatory to the Australian Packaging Covenant (The Covenant). The Covenant is a co-regulatory scheme established by the Commonwealth Government under the *National Environment Protection (Used Packaging Materials) Measure* 2011 to help Australia meet its packaging reduction targets.

All signatories to The Covenant are required to prepare a Sustainable Packaging Policy to provide a roadmap on how they will meet Australia's National Packaging Targets by 2025. These targets are:

- 100% of all Australia's packaging will be reusable, recyclable or compostable by 2025 or earlier;
- 70% of Australia's plastic packaging will be recycled or composted by 2025;
- 50% average recycled content will be included across all packaging by 2025; and
- Problematic and unnecessary single-use plastic packaging will be phased out through design, innovation or introduction of alternatives.

3. Our Sustainable Packaging Principles

We will implement the following Principles through our business in accordance with the *Sustainable Packaging Guidelines* published by the Australian Packaging Covenant Organisation (June 2020)¹.

- 1. Design for recovery;
- 2. Optimise material efficiency;
- 3. Design to reduce product waste;
- 4. Eliminate hazardous materials;
- 5. Use recycled materials;
- 6. Use renewable materials;
- 7. Design to minimise litter;
- 8. Design for transport efficiency;
- 9. Design for accessibility; and

¹ Australian Packaging Covenant Organisation (2020). *Sustainable Packaging Guidelines (SPGs). Published by APCO, June 2020. Internet publication:* https://www.packagingcovenant.org.au/documents/item/1091

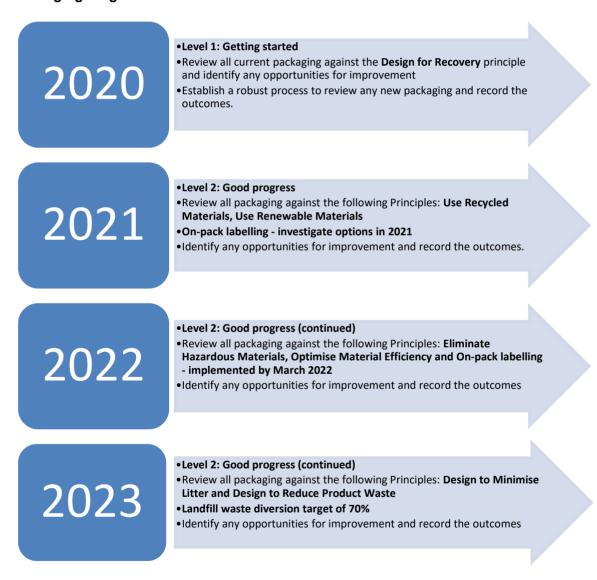
10. Provide consumer information on sustainability.

4. Targets and timeline

To assist us drive progress towards the Australian Packaging Targets, we will work towards achieving "Level 2 Good Progress" as defined in APCO's Sustainable Packaging Guidelines before 2025. Our goal is to achieve the target of Level 2 by 2023.

A summary of the progressive approach that we will take to implementing APCO's Sustainable Packaging Guidelines is summarised in Figure 1.

Figure 1. Summary of OMRON's commitments and targets towards implementing APCO's Sustainable Packaging Guidelines. This will help drive our progress towards the Australian Packaging Targets before 2025.



5. Responsibilities

It is the responsibility of all employees involved in the design of labels and packaging, and sourcing and packaging of OMRON products to follow this policy and procedure. Managers, Supervisors and Team Leaders are responsible for educating their staff and monitoring behaviour to ensure this policy and procedure is implemented and maintained. A cross-functional team has the responsibility

to report on the implementation and adherence to this policy and procedure at least once a year.

6. Policy

We consider four key principles in the design, procurement and recycling of packaging to improve packaging sustainability and reduce the environmental impacts of our packaging:

- 1) Packaging should be designed to meet market and consumer needs, while minimising net impact in a cost-effective way.
- 2) Packaging should be designed to minimise the use of materials and other resources without compromising product quality and safety.
- 3) Packaging should be designed to minimise the environmental and social impact of materials and components.
- 4) Packaging should be designed to maximise its potential for recovery and recycling, and to minimise the environmental and social impacts of its disposal.

OMRON applies these key principles to all new and existing products during the design, procurement and delivery process to ensure that the most sustainable alternatives are considered.

We also encourage customers, suppliers and contractors to reduce their environmental footprint and to identify measures to mitigate the environmental impact of their activities, products and services.

7. Procedure

To meet the four key principles in the design, procurement and recycling of packaging, we should conduct an effective packaging review of all new and existing products and:

- 1) Undertake background research on sustainable packaging and the opportunities that might be available for its relevant packaging types;
- 2) Identify staff members who are able to conduct the packaging review;
- 3) Develop a suitable documentation and filing system;
- 4) Assess packaging using the Packaging Review Checklist (Attachment 1);
- 5) For existing products, undertake the Packaging Review Checklist and determine what (if any) opportunities exist to move to more sustainable practices;
- 6) For new products, use the Packaging Review Checklist to determine whether packaging is necessary or can be avoided and if so, consider buying packaging containing Recycled Material;
- 7) Document the review process and retain underlying evidence for the decisions that were made; and
- 8) Ensure that all packaging is disposed appropriately.

8. Record keeping

Records of product packaging reviews are kept for a minimum of five years.

Attachment 1: OMRON Electronics Pty Ltd Packaging Review Checklist

Completion of this Packaging Review Checklist is required for all existing and new products distributed and sold by OMRON Electronics Pty Ltd in Australia. The checklist shall also be used for new product development, material specification changes and packaging supplier changes.

The purpose is to help ensure that our Packaging Sustainability Policy has been implemented across our Australian business.

| No | APCO Sub- criterion | Product information | Insert Responses | |
|-----|------------------------|---|------------------|--|
| 1 | n/a | Vendor name: | | |
| 2 | | Vendor number: | | |
| 3 | | Product name: | | |
| 4 | | OMRON Reference Number: | | |
| 5 | | Product size / Declared measurement: g, mL, Kg, L, units: | | |
| 6 | | Name of person(s) completing this checklist: | | |
| 7 | | Contact details for person completing this checklist: | | |
| 8 | | Effective Date: | | |
| No. | APCO Sub- | 1. Design for recovery | Insert Responses | |
| | criterion | | | |
| 9 | Recovery pathway | Is the packaging used 100% reusable, recyclable or compostable? | | |
| 10 | Design for | Is the packaging designed for re-use (i.e. can a customer re-use it?) | | |
| 11 | reuse | Can the primary packaging be recycled through kerbside collections? | | |
| 12 | | Are there any opportunities to improve recyclability? Check APCO Product Recyclability Evaluation Portal (PREP) | | |
| 13 | | Do you need to provide any specific instructions to consumers to improve recyclability e.g. flatten, clean etc.? | | |
| 14 | | Is the secondary packaging recyclable? | | |
| 15 | | Are there any opportunities to change the design of the distribution package to improve recyclability? | | |
| 16 | | Considering your previous answers, do you think that the recyclability of the packaging system has been optimised? | | |
| 17 | | If yes, what is the critical area that prevents further improvement in material recycling? (e.g. product protection, packing/filling processes, logistics, safety, legislation etc) | | |
| | | Is composting the best reprocessing technology to divert packaging waste from landfill? | | |
| 19 | recycling | If yes, is the packaging certified as suitable for composting and other microbial treatment according to AS 4736 or AS 5810 (see resources below)? | | |
| 20 | | Is the consumer likely to have convenient access to a service that will collect and compost the packaging? | | |
| 21 | | If not, can you work with others to establish a collection and composting service to ensure that the packaging is actually composted? | | |
| 22 | | Are you providing consumers with information on how to correctly dispose of the packaging? | | |
| No. | APCO Sub- criterion | 2. Optimise material efficiency | Insert Responses | |
| 23 | None | Could any component of packaging be eliminated, i.e. is anything unnecessary? | | |
| 24 | | Could you use a thinner or lighter material? | | |
| 25 | | Could you reduce the size (volume) of the package? | | |
| 26 | | Would these changes have any impact on functionality, product protection, safety, consumer acceptability, recovery potential etc.? | | |
| 27 | | Considering your previous answers, do you think the packaging system has been optimised? | | |
| No. | APCO Sub- criterion | 3. Designed to reduce product waste? | Insert Responses | |
| 28 | None | Do you know how much of your product is damaged and wasted in the supply chain, e.g. due to inadequate packaging, storage or handling? | | |

| 29 | | Are there any opportunities to improve packaging to reduce waste in the | | | |
|-----|---|--|---------------------|--|--|
| 30 | | supply chain? Do you know how much of your product (particularly food) is wasted by | | | |
| | | consumers after purchase? | | | |
| 31 | | Are there any opportunities to improve packaging to reduce the amount of product wasted by consumers? | | | |
| No. | APCO Sub- criterion | 4. Eliminate hazardous materials Insert Respons | | | |
| 32 | None Does your organisation have a risk management approach to the of materials, inks, pigments, coatings, plasticisers and other sub used in packaging or its production processes? | | | | |
| 33 | | Does the production of the packaging utilise any hazardous substances? | | | |
| 34 | | Does the packaging itself contain any potentially hazardous substances? | | | |
| 35 | | If yes to either of the two previous questions, could they be eliminated or reduced? | | | |
| 36 | | Does the packaging meet Australian and /or international standards in relation to hazardous substances? | | | |
| 37 | | Is the packaging likely to contain any hazardous product residue at end of life that may contaminate the recycling process? If yes, consider labelling with the ARL for disposal rather than recycling, and work to establish an alternative collection and recycling program. | | | |
| No | APCO Sub- | 5. Use recycled materials | Insert Responses | | |
| 38 | criterion None | How much recycled content is in your packaging now (tonnes, %)? | | | |
| 39 | | Could you incorporate a higher percentage of recycled content? | | | |
| 40 | | Would higher recycled content have any impact on functionality, product protection, safety, consumer acceptability, efficiency etc.? | | | |
| 41 | | Considering your previous answers, do you think that recycled content in the packaging system has been optimised? | | | |
| 42 | | If yes, what is the critical area that prevents any further increase in | | | |
| | | recycled content? Examples could include: product protection, packaging manufacturing processes, packing/filling processes, logistics, product | | | |
| | | presentation/marketing, user/consumer acceptance, information, safety, | | | |
| | | legislation etc. | | | |
| 43 | | Could you incorporate recycled content in any other products that your organisation buys, to help drive end-markets for recycled material? | | | |
| | APCO Sub- criterion | 6. Use renewable materials | Insert Responses | | |
| | None | Are any of the materials used in your packaging renewable? | | | |
| 45 | | If not, is there potential to use a renewable alternative? | | | |
| 46 | | Is there potential to use renewable materials that have been certified as being from responsible sources, e.g. by Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC)? | | | |
| 47 | | Considering your previous answers, do you think that renewable material content in the packaging system has been optimised? | | | |
| 48 | | If yes, what is the critical area that prevents any further improvement in renewable content? Examples could include: product protection, | | | |
| | | packaging manufacturing processes, packing/filling processes, logistics, | | | |
| | | product presentation/marketing, user/consumer acceptance, information, | | | |
| No | APCO Sub- | safety, legislation etc. 7. Design to minimise litter | Insert Responses | | |
| | criterion | | illosit itoopolises | | |
| | None | Do you understand where, when and how your product will be used and by whom? | | | |
| 50 | | Is the package likely to be consumed away from home and therefore have the propensity to become litter? | | | |
| 51 | | To what extent is this packaging type represented in the litter stream? Refer to the National Litter Index. | | | |
| 52 | | How many separate or easily separable components that could end up as litter does the packaging item have (for example, screw cap lids, and peeloff seals)? Can any be reduced or redesigned? | | | |
| 53 | | Has the package been designed to minimise the number of separate or separable components? | | | |
| 54 | | Do you provide advice for consumers on the label to encourage appropriate disposal or recovery? | | | |
| 55 | | What steps have you undertaken to reduce the occurrence of your packaging in the litter stream? | | | |
| 56 | | Have options been considered for away-from home recycling as part of an overall littering abatement program? | | | |
| | APCO Sub- | 8. Design for transport efficiency | Insert Responses | | |

| | criterion | | |
|-----|-----------|---|-------------------|
| 57 | None | Is there any potential to improve pallet utilisation by redesigning the | |
| | | primary packaging or distribution packaging? | |
| 58 | | Are you optimising pallet utilisation and truck height? Are there any efficiencies that can be achieved? | |
| 59 | | Consider any trade-offs and how they could be managed, for example soft | |
| | | plastics are lightweight but may be more challenging to recycle. | |
| 60 | | Is there an opportunity to switch to more efficient vehicles, hybrid vehicles | |
| C4 | - | or renewable energy sources for your distribution fleet? Could you use back-loading to collect and recycle used packaging from | |
| 61 | | customers as a value adding service? | |
| No | APCO Sub- | 9. Design for accessibility | Insert Responses |
| | criterion | o. Boolgii for dococcibility | moort receptiness |
| 62 | None | Has the consumer's ability to access the product within the packaging | |
| | | been adequately considered in the design process? For example, has a | |
| | | consumer specialist analysed the actions required to interact with the | |
| | | product? | |
| 63 | | Have you considered whether the level of information on the packaging | |
| | | ensures the consumer is aware of its contents and how to open the package? | |
| 64 | - | Have you considered the demographic of the consumer who will use the | |
| | | product? Are there any limiting factors typically associated with these | |
| | | consumers? | |
| 65 | | Can changes be made to improve the ability of the consumer to use the | |
| | | product without compromising safety, security or quality? | |
| 66 | | To what extent has your organisation ever received any complaints in | |
| 67 | | relation to accessibility of packaging? Could an alternative design be used efficiently to minimise the requirement | |
| 67 | | for tools such as a knife or scissors? The use of tools, knives, and scissors | |
| | | should be avoided. | |
| 68 | | Have easy open features been clearly explained or performance tested by | |
| | | Arthritis Australia? | |
| No | APCO Sub- | 10. Provide consumer information on environmental | Insert Responses |
| | criterion | sustainability | |
| 69 | None | Will any environmental claims be made about the packaging item? | |
| 70 | | Has appropriate information about litter prevention been included on all | |
| 71 | | packaging of products likely to be consumed away from home? What environmental issues have been considered during development of | |
| / 1 | | the product's marketing strategy, for example, use of environmental | |
| | | claims, logos and consumer education? | |
| 72 | | If the Australasian Recycling Label is to be used on the packaging, have | |
| | | you identified existing systems that will be able to recycle the packaging? | |
| | | Refer to PREP. | |
| 73 | | If a composting logo is to be used on the packaging, have you identified | |
| | | existing systems that will be able to compost the packaging? Refer to the | |
| | | Australian Standard 4736-2006 –Biodegradable plastics suitable for composting and other microbial treatment, and Australian Standard AS | |
| | | 5810-2010 – Biodegradable plastics - Biodegradable plastics suitable for | |
| | | home composting. | |
| 74 | | If a recycled content claim is made, is the minimum level of recycled | |
| | | content specified in accordance with AS/NZS 14021? | |

Attachment 2: Revision History

This policy is subject to change according to future trends in legal and social requirements.

| Version | Date of revision | Major Points of Revision |
|----------|------------------|--|
| Ver. 1.0 | 24 July 2020 | Draft |
| Ver. 1.1 | 27 July 2020 | Draft v2 – removal of Level 3 as a target. Policy to set Level 2 as a target by 2025 |
| Ver 1.2 | 24 May 2021 | Amended Figure 1 Targets and timeline to include target for on-pack labelling and landfill waste diversion |