

Supplier Sustainability Requirements

Version: 1.2 | Approved by CEO (Andrea Frei) | Effective: 1 January 2024

Classification: Internal use only, do not share externally without management approval

1. Purpose and Scope

This document establishes the minimum sustainability requirements for all packaging product suppliers from whom PrimePack AG procures goods for resale or distribution. It applies to all supplier relationships, both new and existing.

The policy is designed to support PrimePack AG's obligations under the EU Corporate Sustainability Reporting Directive (CSRD) and to enable consistent, evidence-based responses to customer sustainability inquiries.

2. Evidence Standards

PrimePack AG classifies supplier sustainability claims into four evidence levels:

Level	Label	Definition	Customer communication
A	Verified	Third-party verified EPD (ISO 14044 / ISO 14025) or equivalent independent certification	Yes, may be stated as fact
B	Supported	Self-declared claim with supporting calculation; methodology disclosed	With caveat: "self-declared, not independently verified"
C	Claimed	Supplier assertion; no methodology or supporting evidence provided	Not permitted
D	Missing	No data available	Must be flagged as a gap to the customer

Employees must identify the evidence level before responding to any customer sustainability inquiry. Do not upgrade a claim's level without receiving supporting documentation.

3. Requirements by Category

3.1 All Suppliers and Products

- Respond to sustainability questionnaires within 30 days of request.
- Provide a REACH compliance declaration for all products (no SVHC above 0.1% w/w).

- Notify PrimePack AG within 60 days of any material change to product composition or manufacturing processes that could affect sustainability claims.
- Provide updated documentation within 6 months of any relevant certification renewal or expiry.

3.2 Environmental Product Declarations (EPD)

By **31 December 2025**, all tier-1 suppliers must provide, for each product they supply:

- A valid third-party verified EPD conforming to ISO 14025 and the applicable Product Category Rules (PCR), **or**
- A signed commitment letter with a credible EPD delivery schedule and an interim self-declared LCA study following ISO 14044.

Compliance status (January 2025):

Supplier	Product(s)	Status
IPG	50-100, 50-101	Compliant, EPDs on file
CPR System	32-100	Compliant, EPD on file
CPR System	32-101, 32-102	Non-compliant, no EPD; internal calculation only
Relicyc	32-103	Compliant, EPD on file
Relicyc	32-104 (LogyLight)	In progress, LCA commissioned; EPD expected Q2 2025
StabilPlastik	32-105	Compliant, EPD on file
Redbox	11-100	Compliant, EPD on file
Grupak	11-101	Compliant, EPD on file
Tesa SE	50-102	Non-compliant, no EPD; carbon claims unverified

3.3 PFAS (Per- and Polyfluoroalkyl Substances)

Effective **1 July 2024**, PrimePack AG will not accept new products containing intentionally added PFAS into the portfolio.

All tape and adhesive suppliers must provide an explicit PFAS declaration for each product, confirming either:

- The product is free of intentionally added PFAS, **or**
- PFAS content is disclosed with concentration and substance identification

3.4 Recycled Content Claims

- Recycled content claims of 30% or above require either a third-party mass balance audit or disclosure of the calculation methodology.
- "Post-consumer recycled" and "post-industrial recycled" must be distinguished and cannot be aggregated without disclosure.

3.5 FSC and Other Chain-of-Custody Certifications

- FSC claims must be supported by a valid, verifiable FSC Chain of Custody certificate number (verifiable at info.fsc.org).
- Verbal or document-level FSC claims without a certificate number are treated as Level C (Claimed) and may not be passed to customers.

4. Customer Communication Rules

1. **Never cite Level C or D evidence as fact** in customer-facing materials or responses.
2. **All GWP / carbon footprint figures** shared with customers must be sourced from Level A evidence (verified EPD). Figures from internal LCAs must be labelled as unverified.
3. **Forward-looking claims** (e.g., "carbon neutral by 2025") must be clearly labelled as targets, not current status.
4. **Flag open items** to the Sales team before finalising any response to a customer sustainability inquiry.

5. Non-Compliance Process

Suppliers failing to meet requirements by the stated deadlines will be placed on "sustainability review" status. This status:

- Is flagged in the procurement system
- Must be disclosed when the relevant product is offered to customers
- May affect future procurement decisions at management discretion

Exceptions (e.g., extended deadlines) require written approval from the CEO.

6. Review Schedule

This policy will be reviewed annually.