

**Whitbread Responsible Sourcing Policy
Packaging**

Contents

1. Context
2. Scope
3. Policy Requirements
 - 3.1 Design
 - 3.2 Treatment
 - 3.3 Labelling
4. Certification and Accreditation
5. Principles of Implementation
6. Appendix

1. Context

Whitbread recognises it has a responsibility to source with integrity and ensure sound social, ethical and environmental practices within its own operations, within its supply chain and in every market in which it operates. We are committed to ensuring all our procurement practices are carried out in the most sustainable and responsible way possible and this includes responsible procurement of all raw materials sourced to produce any product involved in the Whitbread business.

Whitbread is aware of the growing use of packaging material and its demands on the world's natural resources. The primary role of packaging is to contain and protect the product contained within. Whitbread expects all packaging achieves this in the most efficient way to reduce damages and product rejections whilst being cost effective. Whitbread is committed to working with its suppliers to ensure that the use of materials in packaging is minimised where possible and where materials are used, they are recovered and reused responsibly and according to the waste hierarchy (see Appendix for definitions of the waste hierarchy). Whitbread has an ambition to lead our industry to drive forward better packaging design and product recovery rates.

All Whitbread procurement is subject to compliance with the Whitbread Responsible Sourcing Policy which outlines that 'suppliers may in addition be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.' Whitbread considers the procurement of materials for packaging to be an area of such risk and has therefore created this policy document to sit alongside the Responsible Sourcing Policy.

2. Scope

This policy applies to all types of packaging material at the point which they are formed to become a Whitbread-owned commodity (Whitbread branded, third-party branded, unbranded).

This policy also applies to all downstream treatment and/or disposal of the packaging regardless of where that happens (e.g. applies to Whitbread sites, in homes, places of work etc.).

Whitbread has a preference to work with suppliers who are committed to working to the same packaging principles outlined in this policy throughout their value chain.

The below are types of packaging (see Appendix for definitions). All are in scope of the policy requirements but listed in priority order.

1. Primary (consumer facing, Whitbread branded products)
2. Primary (consumer facing, third-party branded, unbranded products)
3. Primary (operational)
4. Secondary
5. Tertiary

3. Policy requirements

The Whitbread policy ensures that all products and materials within the scope above are sourced in compliance with the following requirements:

3.1 Design

Whitbread expects suppliers to first consider the environmental impact of packaging when designing products for Whitbread. By:

- Eliminating problematic or unnecessary packaging materials (not products).
- Reducing the volume of any materials used.
- Ensuring materials are sustainably sourced in accordance with other relevant commodity policies (e.g. timber, palm oil etc.).
- Substituting materials:
 - for more environmentally friendly options (upstream impact, e.g. higher proportion of recycled content, avoiding non-renewable materials, minimising the use of mixed-materials etc). See Appendix for more information on recycled content.
 - to allow for the packaging to be disposed of in a more environmentally friendly way (in accordance with the waste hierarchy).

Our target is to eliminate* single use plastics by 2025. We will do this by:

*Eliminating unnecessary^ single use plastics and where this cannot be eliminated, we will:

- ensure it is recyclable at its destination (see Appendix for list of recyclable packaging materials on Whitbread sites)
- reduce the volume used
- and/ or ensure it has >30% recycled content

Whitbread defines unnecessary^ single-use plastic as that which is unnecessary for food safety purposes which is used instantaneously as a one-off application and whose removal would not lead to unintended negative environmental consequences, such as increased waste or CO2 emissions. When substituting materials for more environmentally friendly options, using a higher proportion of recycled content in the packaging must not have a detrimental effect on the waste hierarchy.

3.2 Treatment

Whitbread expect suppliers of packaging to follow the waste hierarchy when supplying packaging products for use in our business.

Whitbread's preference is to only use materials at the highest end of this scale. That is to:

- Re-use
- Recycle
- Home compost
- Industrial compost
- Biodegrade

Our ambition is for 100% of our packaging to form part of this hierarchy.

3.3 Labelling

Whitbread's ambition is for all consumer-facing packaging to display treatment, disposal and recycling instructions relevant to its design. Our preference is for all packaging to state relevant material specification, sourcing certification and end-of-life treatment instructions.

Our preference is for branded consumer-facing products to use the OPRL (On-Pack Recycling Label).

4. Certification and Accreditation

Whitbread considers the FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) to be the most comprehensive and widely recognised and accepted forest products certification systems globally and therefore is committed to supporting and giving preference to paper fibre products certified against the FSC and PEFC standards.

Whitbread considers OPRL to be the most widely recognised labelling system for consumer recycling advice in the UK and therefore would expect packaging formats to utilise this labelling system, or a close equivalent.

5. Principles of implementation

As a form of good practice Whitbread keeps a record of all suppliers and systematically monitors the performance of all suppliers of products covered by this policy through direct communication, desk-based certification review and verification. We are committed to periodically reviewing this policy to ensure it is up to date, relevant and conducive to driving continuous improvement throughout our supply chain.

In order for suppliers to effectively implement this policy, Whitbread requires them to:

- Ensure that packaging specifications are included as part of the product specification.
- Ensure this policy is communicated throughout the supply chain.
- Confirm in writing a willingness to comply with this policy.
- Demonstrate full traceability and legality of all packaging sources and design.
- Provide documentary evidence confirming certification to FSC or PEFC standards or other design and treatment claims, or where this is not the case, that a credible system working towards achieving full certification is in place.
- Justify selection of materials used in packaging in relation to the waste hierarchy.
- Demonstrate a system for verifying or working towards verification of recycled packaging sources.
- Meet all the minimum packaging requirements as directed by relevant legislation.
- Take into account PRNs (Packaging Recovery Note) with respect to packaging type and weight.
- Accurately and transparently communicate when these standards are not being met or are unlikely to be met and when support is required to meet these standards.
- Ensure transparency of performance against Whitbread's targets to sustainably source critical commodity products and demonstrate a proactive commitment to support Whitbread in achieving its target through conformance with this policy.
- Advise Whitbread in advance of any new suppliers intended for the production or processing of Whitbread goods and the intention to sub-contract or when sites are no longer used.

Appendix

Types of packaging within scope of this policy

Primary (consumer-facing, Whitbread branded)	Packaging that contains the final product used by our customers (e.g. cups)
Primary (consumer-facing, third-party branded, unbranded)	Packaging that contains the final product used by our customers (e.g. milk portions, sauce sachets)
Primary (operational)	Packaging that contains the final product used in operations (e.g. syrup bottles, food trays)
Secondary	Packaging that contains the final product used in operations (e.g. shrink wrap, box film)
Tertiary	Packaging that is used solely to transport the products (transit packaging rarely seen at operational level e.g. pallets)

List of packaging materials that are currently recyclable on Whitbread sites

- Glass
- Cardboard
- Paper
- Tetrapack
- Metal
- Polyethylene terephthalate (PET)
- High-density polyethylene (HDPE)

Definitions of the waste hierarchy

Our ambition is for 100% of our packaging to form part of this hierarchy, meaning that none of our packaging should be designed in a way that makes it likely to end up in landfill.

Re-use	The action or practice of using a material again, whether for its original purpose or to fulfil a different function. Distinguished from recycling.
Recycle	The breaking down of used or waste items to make raw materials for the manufacture of new products. Recycled products must comply with TEEP regulations i.e. the recovery and recycling of a material must be technically, environmentally and economically practical.
Home compost	The controlled decomposition of organic material into compost, which can be used for soil improvement or as a fertiliser in private households.

Industrial compost	The controlled biological decomposition of organic waste under managed conditions that are predominantly aerobic and allow the development of thermophilic conditions as a result of biologically produced heat, occurring around 50-65 degrees or higher.
Biodegradable	Capable of being broken down and decomposed rapidly by the action of naturally occurring microorganisms without any treatment. Packaging can be thrown away without causing pollution.

Certification and Accreditation

More information on FSC and PEFC is available on the following links

<http://www.fsc.org/index.htm>

www.pefc.co.uk

More information on OPRL is available on the following link

<https://www.oprl.org.uk>

Relevant certification schemes for design and treatment claims as referenced in the waste hierarchy (3.2) are available on the following links

www.tuv-at.be

www.organics-recycling.org.uk

https://www.dincertco.de/en/dincertco/produkte_leistungen/zertifizierung_produkte/verpackungswesen/verpackungswesen.html

http://www.bpf.co.uk/topics/standards_for_compostability.aspx

Signed:

Title:

Date:

I declare that I have received and acknowledge in full the Whitbread Responsible Sourcing Policy Packaging and agree to work with Whitbread towards full compliance.

On behalf of: (Company name):