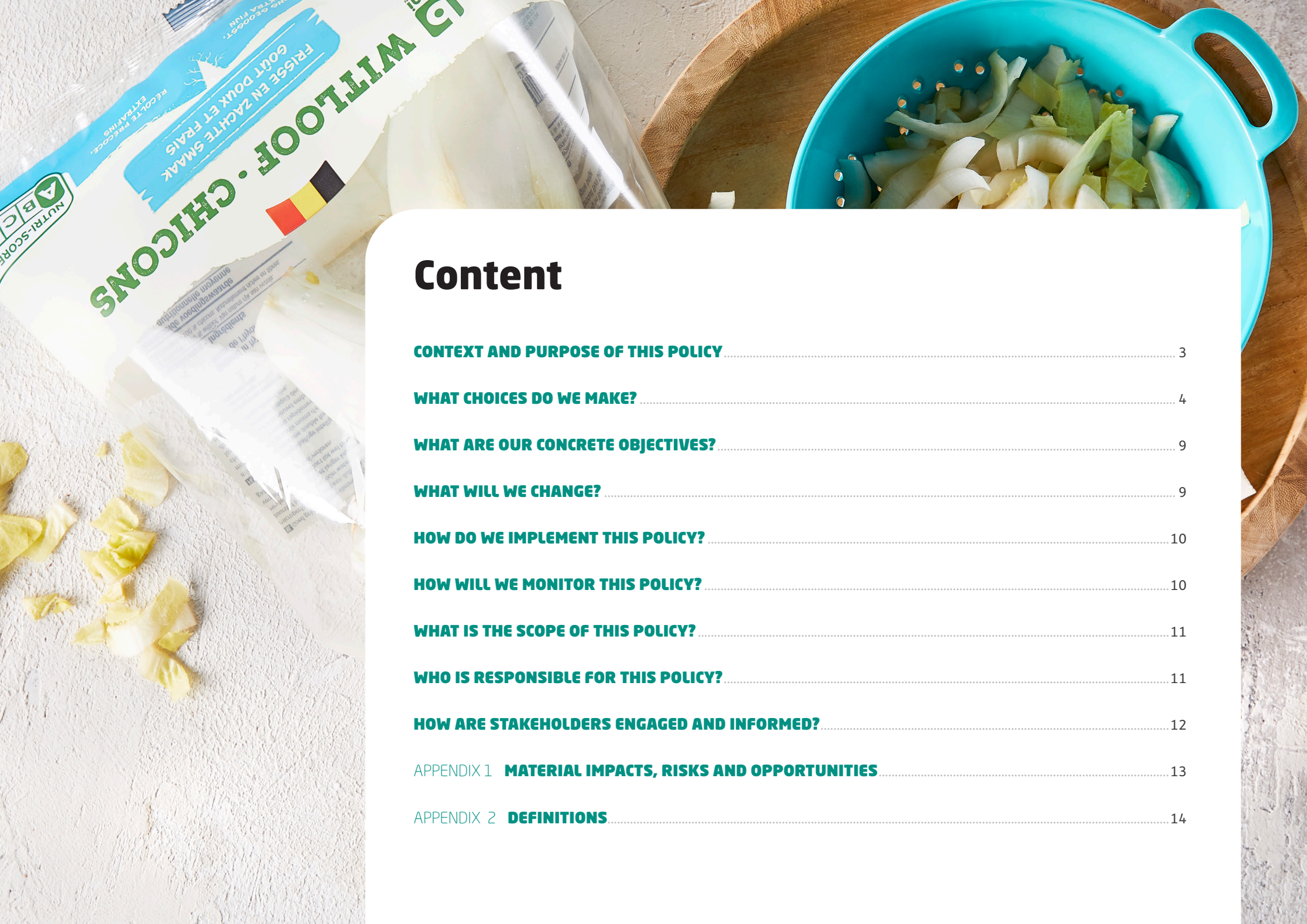


# Our policy for smarter packaging



Version: May 2025





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# CONTEXT AND PURPOSE OF THIS POLICY

Colruyt Group wants to limit the environmental impact of products, including their packaging. This policy describes how we continue to make our packaging more sustainable.

Proper packaging is important, sometimes necessary or even mandatory. Packaging has a number of different functions as well: it protects products, allows food to be stored longer and provides useful and regulatory information.

The sustainability of product and packaging is analysed together in order to arrive at the most sustainable product-packaging combination.

The production of packaging requires raw materials which are becoming increasingly scarce. Packaging is not always recycled and therefore often ends up in landfill.

We want to make conscious and economical use of the raw materials we need. With two objectives: guaranteeing the availability of these raw materials in the future and minimising their impact on people and the environment.

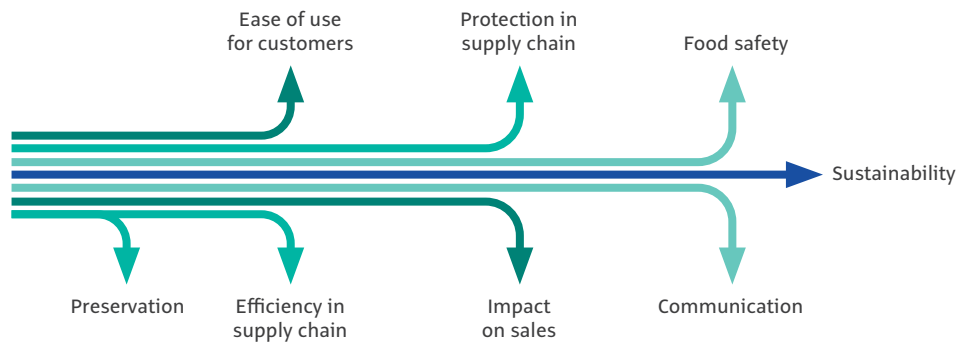
We apply the principles of circular economy to do this.



# WHAT CHOICES DO WE MAKE?

## 1 Each sustainability initiative we take will take into account the various packaging functions throughout the value chain.

Packaging travels a long way from production to customer and has **different functions** throughout its life span. An informed choice is made, considering all the functions of the packaging of which sustainability is part.



The combination of sales, group and transport packaging is a system that should also meet the needs of supply chain and sales. For example, packaging must protect from contamination or breakage, optimise the transport volume (leading to less CO2 in transport), improve the ergonomics for employees and the efficiency throughout the value chain, present the product and contain information for customers.

## 2 The choice of packaging depends on the product. We always choose the most sustainable combination of product and packaging throughout the value chain.

The sustainability of product and packaging is analysed together in order to arrive at a **sustainable product-packaging combination**.

When we look at a product with its packaging, we distinguish between **two types of products**: those with limited shelf life (< 6 weeks: food products) and those with long(er) shelf life (> 6 weeks: food, near-food and non-food products).

- For products with **limited shelf life**, we first opt for packaging that extends the shelf life and reduces potential food waste. Only after that do we reduce the impact of the packaging through the packaging's eco-design.
- For products with **long shelf life** and for group and transport packaging, the focus is immediately on making the packaging more sustainable by applying the principles of eco-design.

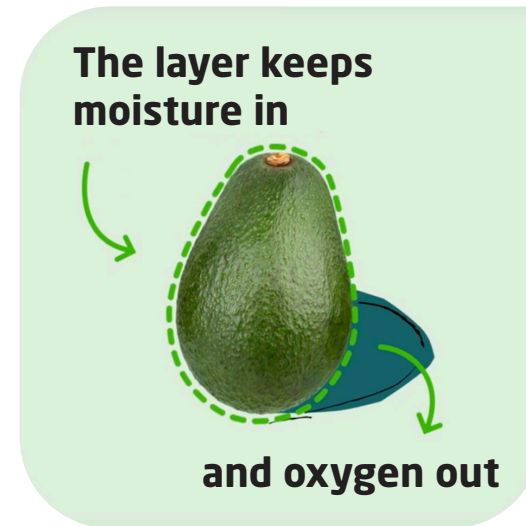
### 3 For products with limited shelf life, we first opt for packaging that extends the shelf life and reduces food waste.

Food waste has a significant influence on a product's environmental impact. One of the functions of packaging is to preserve a product. By choosing the right packaging the shelf life can be extended and thus the **risk of food waste** reduced.

For **short and medium shelf-life** foods, it is therefore suggested that an assessment be made as to whether the packaging can be improved in relation to the shelf-life of the product. Innovation projects and new packaging in particular will play a crucial role here.

Fruit and vegetables are considered as food products with limited shelf life. Therefore, food waste always has to be considered to reduce the environmental impact. **European legislation** also applies to this product group (PPWR - the European Packaging and Packaging Waste Regulation). This seeks to ban plastic packaging for potatoes, fruit and vegetables weighing under 1.5 kg by 2030.

For products with limited shelf life, we also (secondly) reduce the impact of the packaging itself through the packaging's **eco-design**.



The Apeel technology allows us to double the shelf life of avocados.

 <https://www.youtube.com/watch?v=WZbyRmgWpUE>



Thanks to microperforation, chicoray stays fresh twice as long.



4 For products with long shelf life and for group and transport packaging, we always choose to reduce the impact through eco-design throughout the value chain.

**Eco-design** plays a prominent role in making packaging more sustainable, without compromising the product's quality and safety. Eco-design is based on 3 pillars while designing packaging:

- **Focus on refuse/reduce/reuse**
- **Using sustainable materials**
- **Focusing on reuse and recycling**



With the refillable offer of Boni Eco, we contribute to reduce and reuse.



Boni Bio Ghee now comes in recyclable packaging material, a European first.



## ► A Focus on refuse, reduce and reuse

### • Refuse

The **elimination or avoidance of material/packaging** is a good way to reduce the environmental impact throughout the supply chain and should be the first consideration when designing packaging. Packaging that does not perform an essential function (components or materials that do not provide a benefit to the consumer or protect the product from damage or spoilage) is considered obsolete and can be immediately removed without significant modification, innovation or loss of product value.

### • Reduce

**Wherever possible, we reduce** the weight of the material by making the packaging thinner, by using lower density materials or by opting for a new design which makes the packaging smaller or more fitting. We always make the consideration between food safety, the prevention of food waste and using as little packaging material as possible. We optimise the packaging by avoiding both *overpackaging* and *underpackaging*.

### • Reuse

One of the strategies in Eco-design is 'Reuse', or **re-utilisation**. However, with the exception of a few types of packaging, reuse is still in its infancy. The challenges for reusable packaging are infrastructure to return it and return logistics, cleaning and inspection, food safety and liability, consumer behaviour, calculating costs, demonstrating lower environmental impact and administration. Colruyt Group examines these challenges and opportunities of reusable packaging and implements reusable packaging wherever possible.





## ► Focusing on the use of sustainable materials

We maximise the **use of recycled materials in our packaging**. This will increase the demand for recycle, which in turn will improve the economic viability of recycling efforts.

The use of recycled materials is beneficial to the environment, not only because it encourages the supply chain to recycle, but also because it usually consumes **less energy** than using new materials. In addition, it fits perfectly into a circular economy.

Wherever possible we use **renewable materials**, provided they are sustainably produced (i.e. no conflict with food application and demonstrable positive environmental impact). We use **LCA (life cycle analysis)** since it takes into account each step in the life cycle and is therefore the only method to correctly and objectively evaluate total impacts.

We also strive to make our supply chain **deforestation-free**. For fibre packaging that does not come into contact with food, we maximise the use of recycled paper or cardboard. For new fibres, we try to source from **FSC or PEFC certified companies**.

## ► Focusing on recycling: design for recyclability

We optimise the use of materials to facilitate the **recycling process**. The aim is to recover as many pure and high-quality materials as possible at a packaging's end-of-life phase.

We then use these materials again for **the production of new packaging**. We are able to keep the purity of materials high by ensuring correct sorting and by choosing transparent packaging and packaging that consists of as few different materials as possible.

*Examples illustrating this approach can be found on our website:  
Sustainable packaging | Colruyt Group*





# WHAT ARE OUR CONCRETE OBJECTIVES?

By 2030, all packaging in our stores will be recyclable or reusable.

- ▶ For private labels, we already want to achieve this objective by 2025.
- ▶ You can track our progress in our annual sustainability report on our website.

# WHAT WILL WE CHANGE?

Avoiding packaging, reducing it, making it recyclable and/or using recycled materials is about the packaging's **design** and choosing the **right materials** for the packaging.

Avoiding packaging or making it reusable also requires different **business models**, changes to **logistical processes**, adaptations in **stores** and making customers aware of behavioural changes.

Colruyt Group focuses on the following changes to implement our policy:

- making combinations of product and packaging for private labels more sustainable: reducing food waste and applying the principles of eco-design;
- adjusted production processes and lines at Fine Food;
- adjusted supply chain processes;
- adjusted sales processes;
- focusing on changing customers' behaviour; integrating policy in the selection of products and suppliers;
- and focusing on data collection to monitor the evolution of the intended objectives.

# HOW DO WE IMPLEMENT THIS POLICY?

- ▶ For our **own logistical and production operations**, we draw up action plans to continue to make packaging more sustainable. In doing so, we use the principles of eco-design and try to avoid food waste as much as possible. We also use the guidelines and advice from external organisations such as Fostplus, Valipac and Pack4Food.
- ▶ For **private labels**, we work with internal company positions buyers and suppliers have to comply with. We also consider our packaging requirements during consultation with suppliers to switch packaging as soon as possible.
- ▶ **Simultaneously and to support:**
  - we continue to monitor new and executive **legislative initiatives** regarding packaging and align our policy;
  - we observe **trends and evolutions** in the packaging industry, retail and food service;
  - we set up (pre-competitive) collaborations if relevant (after examining utility and necessity);
  - we initiate **pilot projects** to learn by doing;
  - we anticipate future challenges by focusing on **innovation** and breakthrough projects early on;
  - we **evaluate and update** our policy and our action plans.
- ▶ During the implementation of our policy, we ensure that we comply with the provisions of the **European Packaging and Packaging Waste Regulation (PPWR)**. To know which obligations we have to comply with and what the potential impact of the regulation is on our organisation, we set up an impact analysis last year to initiate a roadmap for implementation.

# HOW WILL WE MONITOR THIS POLICY?

The policy was created by the **Packaging Steering Committee**, led by the **Business Lead** for Packaging appointed at Colruyt Group, Jo Willemyns, COO Food Retail. The Sustainability Service Centre ensures the facilitation and preparation of the Steering Committee with a **working group composed of experts**.

In the Steering Committee, the objectives formulated in this policy and the indicators and targets linked to them are monitored periodically. The **Sustainability Service Centre** always prepares the necessary reporting for this. The project managers involved also report on the progress and effectiveness of the changes and actions.

Every year, we go through the following **process**:

- We closely monitor our material **IROs (Impacts, Risks & Opportunities)** and slightly update the double materiality assessment at least once a year, including for packaging. Any changes are integrated in our sustainability strategy.
- We evaluate the **progress of our objectives** regarding packaging by means of the linked indicators and targets.
- Based on this, we determine what has to be adjusted or added to the existing **Packaging policy**. If necessary, strategic choices are adjusted and additional **objectives and indicators** are formulated. These new objectives are validated by the Management Committee. After that, the related **roadmaps** are also updated.



## WHAT IS THE SCOPE OF THIS POLICY?

The policy applies throughout Colruyt Group, in all countries in which we are active and to all our activities in which packaged products are produced, collected, transported, distributed or sold: production, retail, logistics and food service.

The policy applies to **private labels** and to all packaging types (sales packaging, group packaging, transport packaging, e-packaging).

**Each entity** follows the principles from this packaging policy, but has the freedom to add its own accents based on its own strategy.

The **entire value chain** is involved due to our central position as retailer and food service provider: upstream through producers and suppliers, and downstream through all our customers.

## WHO IS RESPONSIBLE FOR THE VALIDATION AND IMPLEMENTATION OF THIS POLICY?

The responsibility for the implementation of the Packaging policy was given to the **Business Lead** for Packaging appointed at Colruyt Group, **Jo Willemyns, COO Food Retail**. The Business Lead takes ownership of the implementation of the policy, as well as the corresponding objectives, and decides on the necessary changes and actions.

It's the responsibility of the Sustainability Service Centre, led by the **Colruyt Group Sustainability Officer**, to ensure the necessary reporting and thus help monitor the effectiveness of the implementation of the policy.

The final responsibility for the implementation of Colruyt Group's overarching sustainability policy lies with Colruyt Group's **Management Committee** led by the CEO.



**Jo Willemyns**  
Business Lead Packaging

# HOW ARE STAKEHOLDERS ENGAGED AND INFORMED?

## Website

All stakeholders can consult the website Sustainable packaging | Colruyt Group for more information on our approach and concrete achievements.

## Annual report

Colruyt Group's annual report also includes information on the policy, the objectives and the actions we take to make packaging more sustainable.

## Communication campaigns

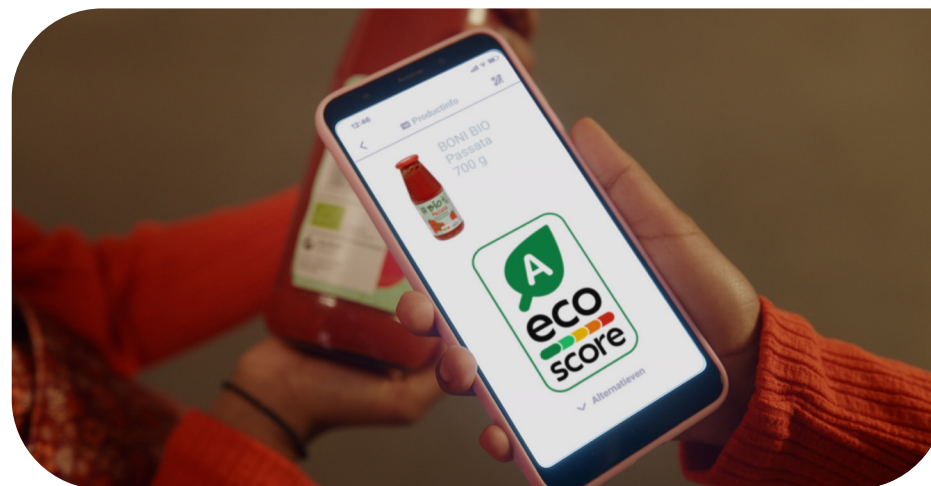
Communication campaigns for our customers are aimed at informing and activating customers. Campaigns inform and motivate B2B and B2C customers to correctly sort packaging.

## Packaging

More sorting instructions are added to packaging. The sustainability of the packaging is also calculated in the Eco-score, which is visible in our food retail formats and in communication campaigns.

## Collaborations

- RPCG provides information and advice to its independent entrepreneurs.
- We collaborate with our suppliers both pro-actively and operationally.  
Pro-actively: we consult on operational trends and regulatory evolutions, with their impact on the packaging industry and the retail sector, and we examine the utility and necessity of (pre-competitive) collaborations.  
Operationally: through communication, our suppliers are informed if the quality requirements, internal company positions, conditions in tenders, etc.
- We also pro-actively collaborate with knowledge institutions, sector federations, solution providers and interest groups to further shape and implement our policy concretely.



## Public Affairs

Public Affairs spreads our vision on packaging, both directly among policymakers at European, federal and regional level and among the federations (Eurocommerce, VBO, Comeos, VOKA, UWE, etc.) and always includes the basic principles of our packaging policy in the lobby on packaging. We translate legislative initiatives to our company level and outline what the potential impact of future regulation may be on Colruyt Group.

In addition to this outside-inside approach, Public Affairs also shares internal concerns, questions and challenges regarding the policy and regulation with the policymakers at various levels.

Thanks to this external and internal interaction, we guarantee a constant monitoring of future legislation for Colruyt Group and feed the awareness of the desirability and feasibility of the proposed policy among policymakers.

As an important Belgian player, we wish to contribute constructively to coming up with, preparing and implementing new legislation and like to act as a sounding board in every stage of the legislative process (e.g. delegated acts PPWR, RD SUP, etc.).



## APPENDIX 1

# MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROS)

Our **material impacts, risks and opportunities** (IRO) were defined by means of a double materiality assessment carried out in the spring of 2024. This assessment focuses on two dimensions: financial materiality and impact materiality.

- **Financial materiality** focuses on the themes that directly influence the economic value and performance of Colruyt Group, such as risks and opportunities that may influence financial results.
- **Impact materiality** on the other hand, looks at how Colruyt Group's activities have social, environmental and economic consequences for the wider society and the planet.

By integrating both perspectives, we get a **broader and deeper understanding** of the relevant sustainability themes that influence both Colruyt Group's financial performance and the impact the company has on society and the environment.

This helps us to:

- continue to integrate sustainability in Colruyt Group's **strategy and decision-making processes** and the further substantiation of the sustainability objectives;
- avoid **sustainability risks** and seize **opportunities** that may have financial consequences for Colruyt Group;
- give investors and other stakeholders a complete image by **reporting and communicating** on the relevant sustainability themes. The materiality assessment is the foundation of the sustainability reporting, as defined in the Corporate Sustainability Reporting Directive (CSRD).

For packaging, these are our material impacts, risks and opportunities:

- Impact of design and choice of material (fossil, mineral, metal, renewable, recycled, recyclable, etc. raw materials) in **primary packaging** on the material footprint of the packaging (and therefore on people and the environment);
- Impact of design and choice of material (fossil, mineral, metal, renewable, recycled, recyclable, etc. raw materials) of **secondary and tertiary packaging** on the material footprint of the packaging;
- Impact of **group packaging** on the material footprint of the packaging.

Material risks detected in double materiality assessment 2024:

- **Reputational risk** if Colruyt Group does not shift (fast enough) to less (outer) packaging and packaging with lower environmental impact.

## APPENDIX 2

# DEFINITIONS

- **Sales packaging:** packaging made in such a way that it represents a single unit, consisting of products and packaging that are offered as a sales unit with 1 price for this unit, to the end user at the outlet.
- **Group packaging:** packaging that is made in such a way that it groups a certain number of sales units at the outlet, regardless of whether this group of sales units is sold as such to the end user, regardless of whether it is a means to facilitate replenishment at the outlet, or to create an inventory-tracking or distribution unit. The group packaging can be removed from the product without changing the characteristics of the product.
- **Transport packaging:** packaging that is made in such a way that it facilitates the materials handling and transport of one or more sales units or a group of sales units, to prevent damage to the product because of the treatment and transportation, with the exception of road, rail, shipping and air containers.
- **E-packaging:** transport packaging that is used to deliver products in the context of online sales or other forms of distance selling to the end user.



**Note:** these are the definitions from the European Packaging and Packaging Waste Regulation (PPWR). Within the PPWR, the terms primary/secondary/tertiary are not used, but the measures are always linked to one of the afore-mentioned definitions. However, primary packaging corresponds to sales packaging, secondary with group packaging and tertiary with transport packaging.



Because the European PPWR does not describe these definitions, we give the definitions of primary/secondary/tertiary packaging **according to the IRPC (Interregional Packaging Commission)**. The IRPC is the public institution that is responsible for the Belgian legislation on packaging waste and waste chuting.

- **Primary packaging or sales packaging:** any packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase, for example packaging that is in direct contact with the product, such as a bottle or can for soft or fizzy drinks.
- **Secondary packaging or group packaging:** packaging conceived so as to constitute at the point of purchase a grouping of a certain number of sales units (primary packages), whether the secondary packaging is sold as such to the final user or consumer or whether it serves only as a means to replenish the shelves at the point of sale. It can be removed from the product without affecting its characteristics. Examples include the plastic packaging around six bottles of soft or fizzy drink.
- **Tertiary packaging or transport packaging:** any packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packages in order to prevent physical handling and transport damage. Transport packaging does not include road, rail, ship and air containers. Examples of this type of packaging include pallets or (heavy) wooden crates.

Here and there, there is a different choice of words or different nuance. We suspect the definitions of the IRPC will also be revised with the implementation of the PPWR.

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Colruyt Group means Colruyt Group NV, including all entities in which a majority stake is held. Moreover, the directors who represent Colruyt Group in participations also propagate the values of this policy, and strive to apply this Colruyt Group Policy there as well as possible.

