

HALLY LABELS

AUSTRALIAN PACKAGING COVENANT ACTION PLAN

MARCH 2013 – MARCH 2018

Brisbane

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EXECUTIVE SUMMARY

Hally Labels acknowledges the adverse impacts that human activity can have on the environment. We recognise that acting in a responsible and sustainable manner is compatible with being a successful business; creating new opportunities, enhancing profitability, and improving environmental outcomes.

To achieve this, Hally Labels has chosen to commit to the Australian Packaging Covenant. In support of this we have implemented a cross functional team to unite the business in our pursuit of the goals and commitments of the APC.

We will develop departmental sustainability champions who will help us shape the culture of Hally Labels. These champions will assist in implementing our Action Plan, the key areas of which are improving our internal packaging, the manufacturing processes to produce the labels we supply to our customers, and other associated business activities to improve our sustainability.

I commit Hally Labels to complying with the principles, policies and procedures of the APC, and the achievement of goals and objectives. I task all staff across Hally Labels with contributing to these commitments. I have ultimate responsibility for reviewing and monitoring the achievement of objectives through regular performance reporting.

Authorised by:

Anne-Marie Sutton

A handwritten signature in blue ink, appearing to read "Anne-Marie Sutton", written in a cursive style.

Group General Manager

Organisational overview/history

Name of the organisation

Hally Labels Pty Ltd

Nature of the organisation

Hally Labels is an Australasian self adhesive label manufacturer. We have four manufacturing plants plus one additional sales office, and have approximately 110 employees in Australia and 210 company wide.

Plants:

Brisbane - 28 Limestone Street, Darra QLD 4076, Australia

Sydney - Units 40-52 132 Hassall Street, Wetherill Park NSW 2164, Australia

Auckland - 24 Hannigan Drive, Glen Innes 1072, New Zealand

Christchurch - 48 Waterloo Road, Sockburn 8042, New Zealand

This plan covers our operations in Australia. We have also joined the Packaging Council of New Zealand's Packaging Product Stewardship Scheme, for which a separate but complementary plan is being developed.

Brands owned by the organisation that are subject to the requirements of the Covenant

Not applicable

The place of the organisation in the supply chain

Hally Labels is a packaging manufacturer, supplying labels to customers in sectors such as retail supermarkets, meat, poultry, beverage, chilled foods, shelf stable foods and logistics. We source label materials from self adhesive label material manufacturers who, in turn source their components from mills, chemical manufacturers and extruders. We print, die-cut and finish these labels into roll form and ship these to customers to apply to their packaging. Our customers typically determine the specification of the labels they require.

See next page for a diagram of our supply chain.

Packaging materials and formats used by the organisation

Hally Labels uses a variety of materials to package our labels to ensure safe delivery to our customers. These include:

- Cartons
- Cores
- Shrink wrap
- Carton labels
- Seal off labels
- Pallet stretch wrap

We also provide a range of labels to our customers, which can be broken into two main categories:

- Paper
- Film



The recycled packaging is converted into PCW materials which are returned to the materials supply chain e.g. PCW Paper and RPET plastic film.



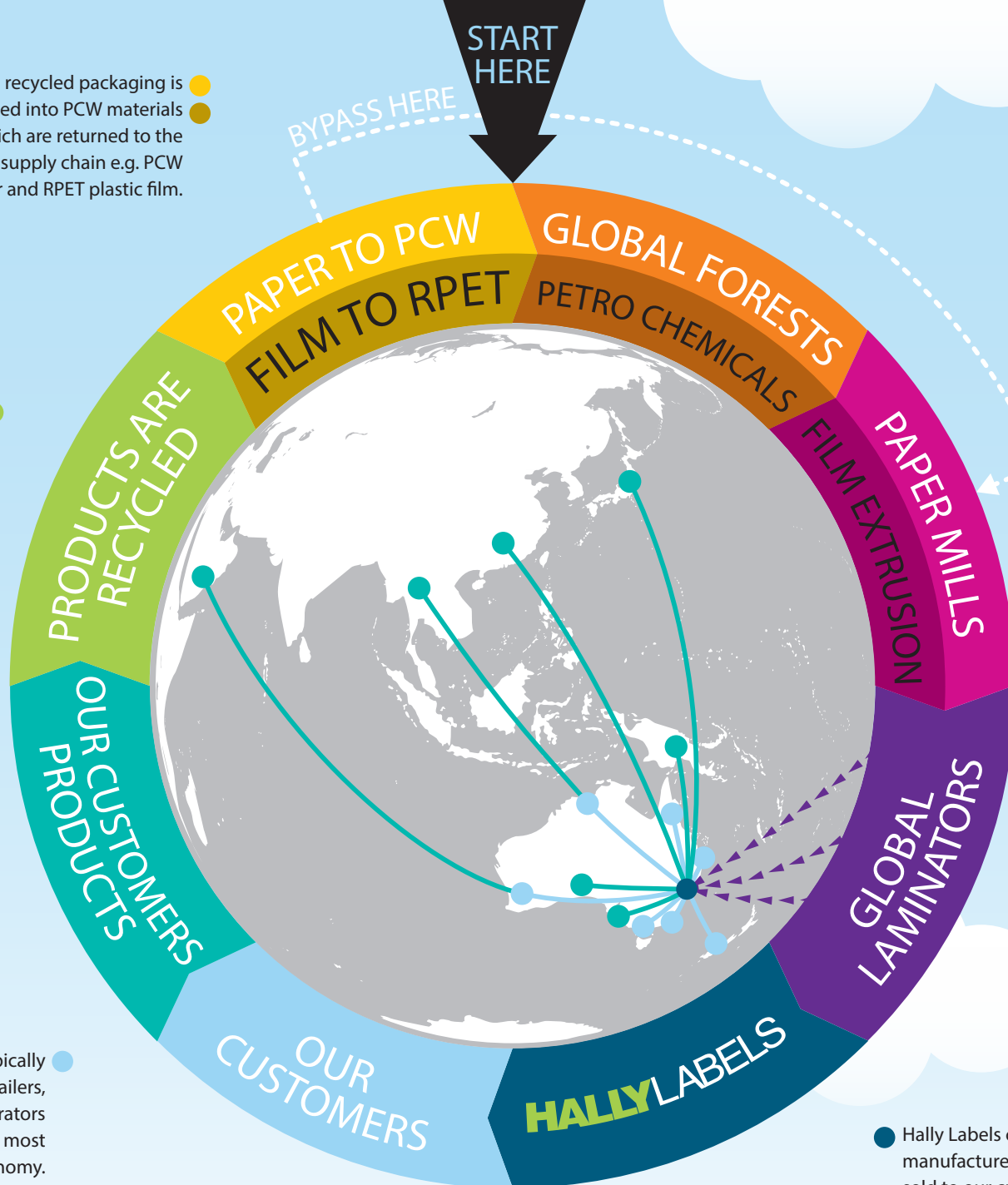
The labels we manufacture are used to decorate or identify packaging e.g. bottles, cartons, which can then be recycled by consumers.



The products and services provided by our customers are consumed globally.



Our customers are typically manufacturers, retailers, logistics and service operators who participate in most sectors of the economy.



Pulp and Paper Mills (often vertically integrated) source lumber from Global Forests, some of which are sustainably managed and certified.



The synthetic plastic films we purchase are extruded polymers which are manufactured from petro chemicals by-products, produced during the refining of crude oil.



Hally Labels works directly with the paper and film "laminators" from across the globe and purchases a range of self adhesive and non self adhesive materials which are both off-the-shelf and constructed to our specifications.



Hally Labels converts these materials and manufactures billions of labels per annum which are sold to our customers for decoration, identification and visual communication of their products.



Packaging groups and schedule for packaging reviews:

| Group | Products included in this group | Assessment Scheduled |
|-----------------------|---|----------------------|
| Carton Labels | Labels applied to the cartons that provide information on the contents e.g. item code, description, job number | October 2013 |
| Seal-Off Labels | Labels that perform the function of sealing the roll of labels from unwinding, and also provide information on that product e.g. item code, job number, quality control information | October 2013 |
| Cores | Cardboard cores that label rolls are wrapped around. Diameters include 25mm, 38mm, 41mm, 76mm, 152mm | January 2014 |
| Cartons | A range of different sized cardboard cartons, some printed and some plain | January 2014 |
| Packaging Tape | Plastic packaging tape used to seal cartons of product | July 2014 |
| Plastic bags | LDPE plastic bags used to protect label rolls inside the carton | January 2015 |
| Shrink Film | Polyolefin film used to wrap label rolls | July 2015 |
| Pallets | Wood and plastic pallets | January 2016 |
| Pallet wrapping film | PE film used to wrap pallets of cartons to ensure safe transit to customers | June 2016 |
| Pallet Protector Mats | Cardboard mats to prevent slippage of cartons on pallets | January 2017 |

Covenant Contact Officer

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Hally Labels has created a cross-functional team to develop and oversee implementation our commitments to the Covenant.

Action plan KPI table

| Performance Goals and KPI's | Actions | Responsibility | Baseline Data | Target | Milestones |
|---|---|----------------|------------------|---|----------------------------------|
| <i>1. Design - optimise packaging to achieve resource efficiency and reduce environmental impact</i> | | | | | |
| KPI 1 Proportion of signatories in the supply chain implementing the Sustainable Packaging Guidelines (SPGs) for design or procurement of packaging | 1.1 Develop customised SPG template to review existing internal packaging and for use in procuring new internal packaging | TPIM | No baseline data | Custom template developed and in use for reviews | Oct 2013 |
| | 1.2 Review all existing internal packaging against the SPGs as per the timetable above using the custom SPG template | Procurement | No baseline data | 100% of existing internal packaging reviewed as per assessment schedule | As per assessment schedule above |
| | 1.3 Use custom SPG template for procuring new internal packaging | Procurement | No baseline data | 100% of new internal packaging reviewed | Oct 2013 to Mar 2018 |
| | 1.4 Integrate the SPGs within the Edge process for new product innovation, to ensure all new packaging projects are assessed during development | TPIM | No baseline data | All projects run through our Edge process to be reviewed | Dec 2013 |
| | 1.5 Create an SPGs checklist to provide to customers for new labels | TPIM | No baseline data | SPGs checklist is available on our website and given to customers by Account Managers | Dec 2014 |

| <i>2. Recycling - the efficient collection and recycling of packaging</i> | | | | | |
|---|---|----------------------------|--|--|----------------------------------|
| KPI 3 Proportion of signatories with on-site recovery systems for recycling used packaging | 3.1 Implement onsite recycling for paper and office goods | Operations | No baseline data | Develop on-site recycling capabilities | Dec 2013 |
| | 3.2 Implement onsite recycling in the lunchroom | Operations | No baseline data | Develop on-site recycling capabilities | Dec 2013 |
| | 3.3 Develop recycling systems for internal packaging (not labels) | Procurement/ Operations | No baseline data | Recycling systems in place | Dec 2013 |
| KPI 4 Proportion of signatories with a policy to buy products made from recycled packaging. All Covenant signatories will have a formal, documented policy of buying recycled products or materials | 4.1 Develop a formal policy/procedure to buy recycled products and materials that is used by the Procurement team for purchasing decisions. | Procurement | We currently do not have an existing policy or procedure | Policy in place and in use | Dec 2013 |
| | 4.2 Review current packaging for opportunities to increase use of recycled products. | Procurement | No baseline data | 100% of all existing internal packaging reviewed | As per assessment schedule above |
| | 4.3 Develop product range for customers of recycled content label materials. | TPIM/ Procurement | No baseline data | Range commercially available for customers | Mar 2014 |
| | 4.4 Review office products and marketing collateral for recycled content opportunities | Marketing/ Admin | No baseline data | Audit completed | Dec 2013 |
| <i>3. Product Stewardship - demonstrated commitment to product stewardship</i> | | | | | |
| KPI 6 Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging | 6.1 Review waste management contracts that require collection and recycling of packaging | Operations | No baseline data | Review completed | Dec 2013 |
| | | | | Opportunities to improve implemented | Dec 2014 |

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|--|---|----------------------|--|---|--------------------------|
| | 6.2 Include in tender questionnaires whether suppliers have implemented APC or similar so that better partnerships for sustainability can be achieved using common goals. | Procurement | No baseline data | Incorporated into procurement policy | Dec 2013 |
| | 6.3 Put in place a requirement in the procurement process that suppliers have regular meetings or product reviews to reduce/reuse/recycle packaging/materials and for suppliers to share their own sustainable learning's | Procurement | No baseline data | In place as part of the procurement process | Dec 2013 |
| | 6.4 Work with suppliers to improve the design of materials and optimise efficiency | Procurement/ TPIM | No baseline data | Improvement opportunities identified | Dec 2014 |
| | | | | Implementation | Dec 2015 |
| KPI 7 Proportion of signatories demonstrating other product stewardship outcomes | 7.1 Investigate new options for label waste recycling or more sustainable disposal | TPIM/ Operations | We currently compact all our waste product to reduce the impact on landfill. Currently incineration with Energy Recovery | Complete the investigation Implement findings of the investigation | Dec 2014 Mar 2016 |

| | | | | | |
|--|--|----------------------|--|----------------------------|----------|
| | | | is the most environmentally efficient recovery route; the product can also be burned in an incinerator with normal refuse or can be buried as a relatively inert material in a landfill. | | |
| | 7.2 Investigate ways to convert waste into new products. E.g. contact Replas to determine recycling opportunity at their new Logan plant | TPIM/ Procurement | No baseline data | Complete the investigation | Dec 2015 |
| | 7.3 Gain FSC/PEFC certification | Quality | No baseline data | Certification approved | Dec 2013 |
| | 7.4 Investigate benefits of installing rainwater tanks | Operations | No baseline data | Investigation completed | Dec 2014 |
| | 7.5 Investigate benefits of gaining ISO 14001 certification | Quality | No baseline data | Investigation completed | Dec 2015 |
| | 7.6 Develop a formal Environmental Sustainability Policy | TPIM | No baseline data | Policy implemented | May 2013 |

| | | | | | |
|--|--|------------|------------------|---|--|
| | 7.7 Develop regular communication materials to keep all staff informed of activities and progress | Marketing | No baseline data | First communication update provided Regular ongoing updates provided | Apr 2013 Through to Mar 2018 |
| | 7.8 Review use and type of company vehicles | Sales | No baseline data | Analysis completed Recommendations implemented | Dec 2013 Ongoing, linked to lease renewal |
| | 7.9 Investigate ways to minimise production waste and optimise efficiency e.g. reduce set up metres, reduce aged inventory, reduce ink waste, optimise web widths, manage butt rolls | Operations | No baseline data | Analysis completed Recommendations implemented | Dec 2014 Dec 2017 |
| | 7.10 Audit current energy use and identify opportunities for improvement | Operations | No baseline data | Audit Completed Opportunities implemented | Dec 2013 Dec 2014 |
| | 7.11 Implement group training workshops for printers to minimise waste when introducing new materials | Operations | No baseline data | Workshops in place | Dec 2014 |
| | 7.12 Comply with AS/NZS 5377:2013 regarding disposal of e-waste | Admin/IT | No baseline data | Policy implemented | Jul 2014 |

| | | | | | |
|--|--|-------------------------------|------------------|--|--|
| | 7.13 Audit paper processes and move to paperless workflow where possible | Admin/CAT/Prepress/Operations | No baseline data | Complete audit of Admin, CAT, Prepress and Operations | Dec 2014 |
| | | | | Implement recommendations from the audit | Dec 2016 |
| | 7.14 Review solvent and chemical use in operations and identify new environmentally friendly options | Operations | No baseline data | Complete review of current solvents and chemicals in use | Dec 2013 |
| | | | | Identify and implement new options | Jun 2014 |
| KPI 8 Reduction in the number of packaging items in litter | Participate in Business Clean-Up Day to address litter on site | TPIM | No baseline data | Annual participation in Business Clean-Up Day | Participate in the 2014 event and each year thereafter |
| | Develop customer education material as to the best waste disposal methods for our products | TPIM | No baseline data | Materials in place | Dec 2014 |
| | Develop information for customers on choosing products that are recyclable | TPIM | No baseline data | Tools in place | Dec 2014 |