Linnaeus Sustainability Claims Protocol

Last Updated: 10th May 2023

What is the intention?

As with all claims, sustainability claims must be truthful, substantiated, and not misleading to the consumer. This Protocol covers on-pack claims as well as point-of-sale marketing, websites, and social media posts. It is aligned with the UK Government's <u>Green Claims Code</u>, which requires:

- The claim is accurate and clear for all to understand
- There's up-to-date, credible evidence to show the green claim is true
- The claim clearly tells the whole story of a product or service or relates to one part of the
 product or service without misleading people about the other parts or the overall impact on the
 environment
- The claim doesn't contain partially correct or incorrect aspects or conditions that apply
- Where general claims (eco-friendly, green, or sustainable for example) are being made, the claim reflects the whole life cycle of the brand, product, business, or service and is justified by the evidence
- If conditions (or caveats) apply to the claim, they're clearly defined and can be understood by
- The claim won't mislead clients or other suppliers
- The claim doesn't exaggerate its positive environmental impact or contain anything untrue whether clearly stated or implied
- Durability or disposability information is clearly explained and labelled
- The claim doesn't omit or hide information about the environmental impact that people need to make informed choices
- Information that can't fit into the claim is easily accessible by the public via QR code, website, or another such channel
- Features or benefits that are necessary standard features or legal requirements of that product or service type aren't claimed as environmental benefits
- If a comparison is being used, the basis of it is fair, accurate, and clear for all to understand

Supplementary information is available in the <u>Mars Global Protocol for Sustainability Claims</u> (Nov 2022) and the <u>MVH governance on External Sustainability Reporting (Dec 2022)</u>. Please contact <u>sustainability@linnaeus.co.uk</u> or the communications team via <u>press@linnaeusgroup.co.uk</u> for any further questions around this protocol.

What are the key principles?

- To ensure sustainability claims are accurate and comply with UK regulations
- To enable early review of potential sustainability claims
- To support the use of independently audited, internationally recognised certifications/logos
- To prevent claims that compare Mars and its brands with other companies or competitors

What is my responsibility?

Responsible for following the protocol document accordingly:

- Marketing teams Heads of Marketing; Marketing Executives; BRMs
- Operations teams –Investors in the Environment Leads

Responsible for managing the protocol document and approving communications:

- Communications team Head of Communications <u>Russell Elliott</u> and Corporate Communications Manager <u>Rebecca Bannister</u>
- Environmental Sustainability Lead Ellie West
- Linnaeus legal team Marina Zain
- Mars Petcare Sustainability VP Marika McCauley Sine
- MVH Global Sustainability Director Margo Mosher

Types of claims

Claims that have low risk require review by the Sustainability Lead (with support from the Communications team). Low-risk claims at Linnaeus and claims listed in the tables include:

- Tree-planting (not linked to carbon offsetting)
- Third-party certification including Investors in the Environment, EcoVadis, FSC
- Zero waste to landfill

Claims that have a greater risk of challenge and those about which there is disagreement among external stakeholders require Mars corporate review. In these cases, the Linnaeus legal team must review all sustainability content, facilitated by the Linnaeus communications team as part of its own review. This may take 1-2 months to complete. High-risk claims at Linnaeus, in addition to claims listed in the tables, include:

- Upcycled
- Sustainably / Responsibly Sourced
- Cruelty Free / Animal Welfare Claims
- Green / Eco-Friendly / Sustainable / Nature-Friendly
- Carbon offsets including tree planting (supporting Carbon Credit Projects)
- Carbon neutral or net zero emissions (or any similar variation)
- Lower carbon / Lower carbon footprint
- Renewable electricity
- Reduced transport logistics
- Fossil-fuel free claims

Claims that cannot be used include:

- Carbon positive / Net zero
- Water positive / water neutral
- Zero impact



Endorsements:

- It is common to be approached by third parties for endorsement. Mars policy is that endorsement is not permitted (including joint press releases/quotes for press releases or websites) unless there is a clear benefit to Mars.
- The benefit should consist of improved reputation through openness and transparency, demonstrate leadership through adoption of innovative approaches and best-in-class partnerships, demonstrate an extended economic footprint in key geographies, and/or secure economic benefit.
- All market-level regulations, self-regulatory industry codes of practice, and Mars corporate policies should be adhered to
- If presented with an opportunity you'd like to participate in and think qualifies for an exception based on the below criteria, please contact our <u>Sustainability</u> team, so we can help you secure the necessary approvals to move forward.

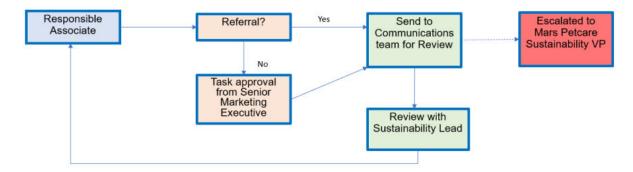
Examples of Claims

PACKAGING CLAIMS	
Corporate Review Not Required Lower Risk Claims Review according to local approval process is needed.	Reduced Packaging/Less Plastic Free of Plastic-free Recycled Content (traceable) Reusable/Refillable Certified Material Made with Paper / Paper-Based Recyclable (if using third-party Market Scheme)
Corporate Review Required Higher Risk Claims Local approval process is needed.	Lower Carbon Packaging Recycled Content (Mass Balance) Recyclable (if self-defined claim) Designed for Recycling Renewable Bio-Based Compostable (with BPI certification) Uses Ocean Plastic / Ocean Bound Plastic Green / Eco-Friendly / Sustainable / Nature-Friendly
Unacceptable / Do Not Use	Oxo / Photo / Marine-Degradable Biodegradable

SOURCING CLAIMS	
Corporate Review Not Required Lower Risk Claims	Certified
Corporate Review Required Higher Risk Claims	Lower Carbon Footprint Carbon Neutral Reduced Water Usage Water Balanced Deforestation-Free Tree Planting Sustainably / Responsibly Sourced Climate-Smart / Regenerative Agriculture Increased Yields Upcycled Cruelty-Free / Animal Welfare Claims Improved / Increased Household Income Gender Empowerment Green / Eco-Friendly
Unacceptable / Do Not Use	Carbon Positive / Net Zero Water Positive / Water Neutral

OPERATIONS-RELATED CLAIMS	
Corporate Review Not Required Lower Risk Claims	Product Made in a Zero Waste to Landfill Factory Made in a LEED Facility
Corporate Review Required Higher Risk Claims	Made with Less Water Made with Renewable [Electricity Source] or Thermal Water Balanced (factory) Reduced Transport Logistics (distance or GHG) Fossil Fuel-Free Claim for Direct Operation
Unacceptable / Do Not Use	See Unacceptable Claims List under Packaging and Sourcing Sections

What to do if Mars Corporate Review is Not Required



What to do if Mars Corporate Review is Required

