



Recyclability Implementation Plan

July 2026

1 Introduction

At Rituals, we aim to support a more circular use of materials. Improving the recyclability of our packaging portfolio is an important component of this ambition. This recyclability implementation plan sets out the actions we plan to undertake in support of achieving our recyclability target.

This plan applies to Rituals Cosmetics Enterprise B.V. and all consolidated entities (hereafter: the Company) and focuses on improving the recyclability performance of our packaging portfolio, strengthening the quality of recyclability data and reporting, and supporting compliance with relevant regulatory requirements, including the Packaging and Packaging Waste Regulation (PPWR).

2 Objective

This document provides a high-level overview of our recyclability implementation plan, including our recyclability target, recyclability baseline, key implementation actions, and governance approach.

The objective is to be transparent about our ambition and provide insight into how we aim to improve the recyclability performance of our packaging portfolio.

As we continue to improve packaging data quality, strengthen supporting systems and processes, and further develop our recyclability assessment approach, we will continue to refine and expand the actions described in this plan. Therefore, this plan should be viewed as a living document that will be updated periodically to reflect implementation progress, evolving insights, regulatory developments, and improvements in data quality.

While it provides a foundation for our recyclability journey, it should not be interpreted as a fully quantified roadmap demonstrating achievement of the target. Please refer to the latest available version.

3 Scope and reporting boundary

This plan relates to packaging associated with products procured during the 2025 financial year.

For the purpose of this plan:

- packaging materials are recognized as outflow data when they are sold by Rituals Cosmetics Enterprise B.V., as this reflects packaging placed on the market during 2025 and therefore the packaging that ultimately enters the waste stream and is assessed for end-of-life recyclability;
- **sales packaging (primary packaging)** and **grouped packaging (secondary packaging)** associated with sellable products are included in scope;
- **transport packaging (tertiary packaging)** is excluded from scope;
- packaging is procured via packaging manufacturers and third-party full-service providers, as the Company does not operate its own manufacturing or filling facilities;
- Packaging is assessed at both packaging and component level where relevant. For the 2025 baseline, “Recyclability by Total Packaging” is used as the primary KPI, as it aligns with the Company’s portfolio-level recyclability target. Additional analyses at material and component level may be used to support future improvement initiatives.



4 Our targets

By 2030, Rituals aims to achieve a minimum packaging recyclability rate of **70%**, in line with the recyclability performance requirements of the Packaging and Packaging Waste Regulation (PPWR). This target is assessed at portfolio level and reflects the Company's ambition to improve the recyclability performance of packaging placed on the market.

As packaging data quality, recyclability methodologies, and regulatory requirements continue to evolve, Rituals may further refine supporting analyses, methodologies, and reporting approaches over time. Progress towards the target, as well as the actions supporting its delivery, will continue to be reviewed against technical feasibility, regulatory developments, supplier readiness, and data maturity.

5 Baseline and current status

As part of establishing its recyclability target, Rituals has developed a portfolio-level recyclability baseline for packaging placed on the market during the 2025 financial year.

While an initial assessment has been performed, we are continuing to enhance our understanding of portfolio recyclability through improvements in data quality, portfolio coverage and assessment methodology. The implementation of a new assessment tool will further strengthen the accuracy and consistency of our recyclability assessment, providing a more robust foundation for performance tracking.

We will therefore use 2026 to further strengthen our methodology, data and assessment capabilities. From 2027 onwards, we intend to disclose a recyclability baseline and report progress against our recyclability target using the enhanced assessment approach.

The baseline will serve as the reference point for monitoring progress towards the Company's 2030 recyclability target. As packaging data quality, assessment methodologies, and regulatory requirements continue to evolve, the baseline may be further refined where justified by improved data availability, methodological developments, or regulatory requirements.

6 Recyclability actions

These actions support the Company's objective of achieving a minimum packaging recyclability rate of 70% by 2030. The Company currently focuses on actions related to packaging design, packaging data quality, recyclability assessments, supplier engagement, and PPWR preparedness.

6.1 Packaging design and portfolio improvement

For packaging design, the current priorities are to:

- identify packaging formats with lower recyclability performance;
- reduce or redesign components that negatively impact recyclability, such as multi-material elements, labels, sleeves, adhesives, pumps and inserts, where technically feasible;
- apply Design for Recycling principles in packaging development and redesign projects;
- assess material substitutions and packaging simplification opportunities;
- use portfolio insights to prioritize packaging improvements with the greatest impact on the overall recyclability rate
- identify and initiate research projects

6.2 Data quality and methodology

For recyclability data and methodology, the current priorities are to:



- improve the completeness and accuracy of packaging composition data;
- strengthen the link between packaging specifications, supplier information and recyclability assessments;
- document assumptions, exclusions, extrapolations and calculation methodologies;
- maintain supporting evidence for recyclability reporting and future validation;
- improve consistency between historical manual data and future system-based assessments

6.3 Recyclability tool implementation

Rituals is implementing Recyclability tool as the future standard platform for recyclability assessments.

Current priorities are to:

- validate the packaging attributes required for the recyclability tool assessments;
- connect relevant packaging data from Product Lifecycle Management (PLM) system and Google Cloud Platform (GCP) to Recyclability tool;
- transition from manual assessments to a more standardized and scalable assessment process;
- improve portfolio-level reporting and monitoring of recyclability performance;
- support alignment with evolving PPWR recyclability requirements.

6.4 Supplier engagement

Supplier engagement is required to improve data quality and support packaging improvements.

Current priorities are to:

- collect packaging composition and material information from suppliers, through structured data collection processes and the implementation of Product Lifecycle Management (PLM) system as the central packaging data management system;
- improve the quality of technical specifications and supporting documentation; through clear ownership of packaging documentation and sustainability data, and through alignment of supplier performance reviews and data requirements;
- align suppliers with Rituals' recyclability requirements and Design for Recycling principles by clarifying KPIs and notifying suppliers, through official communications and briefings, when sustainability regulations and strategy evolve
- engage suppliers on feasible packaging improvements where current packaging design limits recyclability, by defining clear ownership between Innovation, R&D Packaging, and Sustainability for data sharing and packaging improvement initiatives.

These actions are at different stages of maturity and may evolve as data quality improves, Recyclability tool is implemented, and further packaging improvement opportunities are identified.

6.5 Key factors for implementation

The delivery of these actions depends on the availability and quality of packaging data, supplier cooperation, technical feasibility, cost implications, product quality requirements, and the development of recycling infrastructure and regulatory requirements.



Some of these factors are outside the Company's direct control. As a result, the timing, scale and impact of individual actions may vary over time. Nevertheless, these factors are important for assessing the feasibility and effectiveness of the implementation plan.

7 Indicative timeline

The actions described in this plan are at different stages of maturity. The indicative timeline has been informed by practical experience gained through packaging development activities, supplier engagement, packaging data improvement initiatives and the ongoing implementation of Recyclability tool and supporting data systems.

Current expected implementation includes:

2026

- establish and validate the 2025 recyclability baseline methodology;
- implement Recyclability tool as the standard platform for recyclability assessments;
- improve material classifications and packaging data quality;
- strengthen supporting documentation, calculation methodologies, and auditability.

2026-2027

- integrate recyclability requirements into packaging development and sourcing processes;
- strengthen data integration between Product Lifecycle Management (PLM) system, Google Cloud Platform (GCP), and Recyclability tool;
- improve supplier data quality, technical specifications, and supporting evidence;
- establish portfolio-level recyclability reporting and performance monitoring.
- Identify and maintain already initiated research project to improve recyclability.

2027-2028

- continue efforts for optimizing packaging recyclability and recalibrate when required.
- update definitions and related CEN norms based related updates on PPWR directive.
- continue supplier engagement and improve data quality and assessment coverage;
- use Recyclability tool insights to identify and prioritise further recyclability improvement opportunities across the portfolio;
- monitor progress towards the 2030 target and adjust implementation priorities where required

2028-2030

- continue portfolio optimization activities to improve overall recyclability performance;
- refine methodologies, systems, and implementation activities in response to technical, commercial, and regulatory developments;
- maintain alignment with evolving PPWR recyclability requirements and update new targets for 2040.

8 Tracking and reporting

The Company measures and reports packaging recyclability annually using **"Recyclability by Total Packaging"**, which serves as the primary KPI for portfolio-level reporting and target tracking.

To support this process, the Company collects packaging composition data, supplier information, technical specifications, and recyclability assessment data. Going forward, Recyclability tool will be used as the standard platform for recyclability assessments, reporting, and portfolio-level analysis.



At present, recyclability performance is primarily assessed through the annual reporting cycle. Going forward, the recyclability assessment tool Recyclability tool is expected to support portfolio-level recyclability monitoring and reporting, providing improved visibility of recyclability performance and opportunities for improvement as data quality, assessment coverage and system integration mature.

The Company's baseline development and ongoing data improvement activities have highlighted the importance of data quality, packaging specifications, and consistent assessment methodologies. In line with good practice, the Company may update historical baseline values, methodologies, assumptions, and reporting approaches where justified by improved data availability, methodological developments, or regulatory requirements.

9 Governance and review

This implementation plan prioritizes actions that are expected to have the greatest impact on improving the recyclability performance of the Company's packaging portfolio and is supported through existing governance processes.

Progress against this plan is reviewed periodically as part of broader business planning and sustainability governance. The plan may be updated to reflect:

- regulatory developments,
- implementation progress,
- supplier readiness,
- technical constraints,
- improved data quality,
- and changes in portfolio composition.

Reporting and oversight are embedded in this framework through quarterly updates to the Executive Committee and ESG Steering Committee. Implementation of this plan is coordinated by Innovation R&D Packaging. Delivery of the actions may involve collaboration with other functions and external stakeholders, including Sustainability/Impact, suppliers and data management teams, depending on the nature of the activity. The actions described in this plan are intended to be implemented through existing teams and responsibilities. No specific competency framework or formal personnel requirements have been defined specifically for this implementation plan. The plan will be reviewed annually with the relevant stakeholders to ensure it reflects the latest information on our initiatives.

No formal contingency plans or risk mitigation plans have been established specifically for this implementation plan. Where implementation challenges arise, such as supplier constraints, data availability issues, technical feasibility challenges or regulatory developments, these are reviewed through existing governance processes. Based on the outcome of these reviews, implementation actions, timelines and priorities may be adjusted where considered appropriate.

While certain financial details are commercially sensitive and are therefore not publicly disclosed, the actions described are supported by budget allocations and resourcing embedded in business planning and approved through internal governance processes.

10 Limitations and forward-looking nature

This implementation plan reflects Rituals' current expectations as of July 2026. The actions described are expected to evolve over time as implementation progresses, data quality improves, and new opportunities or constraints are identified. Key assumptions underpinning this implementation plan include continued supplier engagement, availability and quality of packaging data, progress in the implementation of Recyclability tool and supporting data systems, and continued alignment with evolving PPWR requirements.



Rituals intends to provide periodic updates on progress, key initiatives, and relevant assumptions underpinning its recyclability approach.