



Recycled Content Implementation Plan

July 2026

1 Introduction

At Rituals, we aim to support a more circular use of materials. Increasing the use of recycled content in packaging is an important component of this ambition. This post-consumer recycled (PCR) implementation plan sets out the actions we plan to undertake in support of achieving our recycled content targets.

This plan applies to Rituals Cosmetics Enterprise B.V. and all consolidated entities (hereafter: the Company) and focuses on increasing the use of PCR content in packaging, strengthening the quality of recycled content data and reporting, and supporting compliance with relevant regulatory requirements.

2 Objective

This document provides a high-level overview of our PCR implementation plan, including our recycled content targets, current baseline, key implementation actions, and governance approach.

The objective is to be transparent about our ambition and provide insight into how we aim to increase recycled content across our packaging portfolio.

As we continue to improve packaging data quality, strengthen supporting systems and processes, and further develop our recycled content reporting 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 annually to reflect implementation progress, evolving insights, regulatory developments, and improvements in data quality.

The actions and initiatives described in this plan support the achievement of the Company's recycled content targets and will be further refined as implementation progresses and additional information becomes available.

3 Scope and reporting boundary

This implementation plan is based on packaging associated with products procured during the 2025 financial year, which is used as the baseline for assessing current recycled content performance. The actions and initiatives described in this plan are intended to support achievement of the Company's future recycled content targets

For the purpose of this plan:

- packaging materials are recognized as resource inflows when they enter the warehouses of Rituals Cosmetics Enterprise B.V.; sales- and grouped packaging associated with sellable products are included in scope;
- transport 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.



For reporting purposes, the Company classifies packaging into relevant material categories using internal packaging data and supplier information. This classification will be further refined as part of the implementation plan, particularly for categories requiring additional granularity, such as opaque versus transparent PET and rigid PP/PE packaging.

Post-industrial recycled (PIR) material is currently excluded from PCR reporting where this is not aligned with the intended regulatory interpretation for post-consumer recycled content claims.

4 Targets

Rituals has established recycled content targets for key packaging material categories.

For all products in our consumer facing portfolio that contain the material components listed below, we aim to meet the following material-specific recycled content targets by 2030:

- at least 95% recycled content for ferrous and non-ferrous metals (aluminium and steel),
- at least 65% recycled content for opaque polyethylene terephthalate (PET),
- at least 90% recycled content for transparent polyethylene terephthalate (PET),
- at least 35% for polypropylene (PP) and polyethylene (PE) Rigid & Flexibles.

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

5 Baseline and current status

The Company has consolidated recycled content data at material-category level for the 2025 baseline. Based on currently available data, the portfolio includes recorded PCR weight across the material category groups.

Table 1. Baseline values for each material category

Material Category	Baseline Value
Non-ferrous materials (Aluminium & Steel)	68%
Opaque PET	49%
Transparent PET	68%
PP and PE Rigid & Flexibles	6%

** all missing data is filled as 0% PCR as we did not receive Chain-of-Custody (CoC) evidence for the missing data and therefore cannot assure compliancy towards traceability and validity of the PCR.*

6 Actions regarding increasing recycled content

These actions support the Company's recycled content targets and focus on improving recycled content performance, data quality, supplier engagement, and integration of recycled content requirements into packaging development and sourcing processes.

6.1 Packaging design and portfolio improvement

To increase recycled content across the packaging portfolio, current priorities are to:



- **identify** packaging categories with the greatest opportunity to increase recycled content through portfolio-level analysis, including an assessment of commercial/technical availability (viability), technical feasibility in relation to the to-be-packaged product(s) and desirability in terms of achievable functionality and aesthetic appearance.
- **prioritize and sequence** the most promising materials and packaging formats for implementation, using portfolio-level 'waterfall' analyses and PowerBI dashboarding to support project planning and decision-making.
- **validate** technical feasibility, product quality implications, aesthetic considerations, and cost impacts during packaging development projects, with recycled content considerations reviewed as part of the packaging development process.

6.2 Data quality and supplier engagement

Experience gained through the Product Data Program (PDP), supplier engagement activities and ongoing packaging development projects have been used to inform the actions described in this plan. For recycled content data and reporting, Rituals is implementing a new Product Lifecycle Management (PLM) system. Current priorities are to:

- improve the completeness and accuracy of recycled content data through structured supplier data collection;
- strengthen the link between packaging specifications, supplier declarations, and reported PCR values;
- improve traceability and substantiation of recycled content claims;
- document assumptions, exclusions, extrapolations, and calculation methodologies;
- maintain supporting evidence for recycled content reporting and future validation.

6.3 Product development and sourcing

Supplier engagement and ongoing packaging development activities have provided practical insight into material availability, supplier readiness and potential supply constraints relevant to implementation of the targets.

Current priorities are to:

- embed PCR requirements in packaging development and sourcing processes; by integrating them into packaging specifications, development briefs, supplier requirements, and the packaging data management process.
- evaluate recycled content opportunities during packaging redesign and material conversion projects;
- strengthen ownership and tracking of PCR-related initiatives across teams, including R&D Packaging and Sourcing;
- translate recycled content ambitions into packaging specifications and packaging decision-making processes;
- monitor market developments in recycled material availability, capacity, and technical maturity across packaging materials, informed by suppliers, consortia, and governmental or semi-governmental sources.

6.4 Systems enablement

Existing systems, including PLM and the Packaging Dashboard in PowerBI, support implementation of the plan through data collection, monitoring, reporting and identification of recycled content opportunities:

PLCM / NPD process

This workstream supports improved project execution, clearer responsibilities, and better delivery of product and data outputs.

Product Lifecycle Management (PLM) system

This system supports documentation management, supplier interaction, product data capture, claim control, and compliance related information. Future enhancements may further improve structured data collection for recycled content reporting.

PowerBI Packaging Dashboard

This dashboard tracks based on data PLM system, supplier input and insights per packaging- and product category the coverage and gap towards PCR%.



6.5 Key factors for implementation

The delivery of these actions depends on supplier engagement, availability of recycled materials, technical feasibility at manufacturing side (raw material suppliers, compounders, converters, producer parties), technical feasibility at end-of-life (waste collectors, sorters, washers and converters), product quality requirements, cost implications, and regulatory developments.

These factors represent the key dependencies and constraints associated with implementation of this plan. Supplier engagement, availability of suitable PCR materials, technical feasibility and regulatory developments may influence the timing, scale and effectiveness of implementation activities.

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 remain important in assessing the feasibility and effectiveness of the implementation plan.

7 Indicative timeline

The actions described in this plan are at different stages of maturity. Current expected implementation includes:

2026:

- strengthen baseline methodology;
- improve material classification, and enhance supporting documentation;
- structure key initiatives towards completion of PCR targets.
- Identify capacity and/or market availability at suppliers' side.

2026–2027:

- roll-out implementation plan towards product development projects to ensure closing of gaps
- identify and initiate (when feasible) technical projects to overcome technical challenges towards PCR implementations towards different packaging materials.

2027–2028:

- updating / reviewing PCR calculations and definitions based on PPWR related CEN standards (announced) for update by EU bodies.
- expand supplier data quality and improve reporting granularity for target material categories.
- ensuring execution towards 2030 completion of targets, recalibrate projects when required.

2028–2030:

- continue portfolio conversion, monitor progress against targets, and refine implementation based on technical, commercial, and regulatory developments.
- recalibrate targets when required, only in case of material regulatory or methodological changes and update/define new targets towards 2040 latest by 2029 Q2.

8 Tracking and reporting

The Company measures and reports recycled content annually using portfolio-level PCR calculations based on packaging specifications, supplier declarations, Certificates of Conformity (CoCs), and supporting evidence.

Internally, PCR performance is monitored periodically through portfolio-level reporting and analysis of the Company's target material categories, including aluminum and steel, opaque and transparent PET, and rigid/flexible PP and PE packaging. The reporting happens through decision-making boards on project level (NPD meetings), portfolio level (Perfect Portfolio Meetings) and company level (Executive Committee Meetings), to ensure visibility all over the different business layers.



The Company's baseline development and ongoing data improvement activities have highlighted the importance of data quality, supplier documentation, and consistent reporting 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 requirement.

9 Governance and review

Progress against this plan is reviewed annually as part of broader business planning and sustainability governance. Progress against the implementation plan is reviewed through existing project, portfolio and governance meetings, including new product meetings, Executive Committee meetings and ESG Steering Committee meetings.

The plan may be updated to reflect:

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

Moreover, the implementation plan was developed based on lessons learned from the Product Data Program (PDP), ongoing packaging development projects and supplier engagement activities. The proposed actions were designed to be implemented through existing business processes, governance structures and team responsibilities. Implementation of the actions described in this plan is primarily coordinated by R&D Packaging, in collaboration with the Impact team.

No formal resource assessment was performed specifically for development of this implementation plan. The actions described are embedded within existing business processes, teams and governance structures. No formal escalation thresholds or documented escalation procedures have been defined specifically for this implementation plan. Implementation challenges or delays are discussed through the existing governance structure and may lead to reprioritisation of activities, adjustment of timelines or review of support needs. Factors such as supplier engagement, data availability, technical feasibility and integration into existing business processes may affect implementation progress and achievement of the targets.

Reporting and oversight are embedded in this framework through quarterly updates to the Executive Committee and ESG Steering Committee. The plan will be reviewed annually with the relevant stakeholders to ensure it reflects the latest information on our initiatives.

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.

9.1 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 plan include continued supplier engagement, availability of relevant packaging data, integration of actions into existing business processes and governance structures, and the continued suitability of existing systems and ways of working.

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