

# Environmental Claims Trade Supplier Content Policy

## Introduction

At Superdrug, we're committed to providing clear, accurate and customer friendly information to support our customers with their shopping choices, ensure compliance with applicable UK consumer protection law and maintain customer trust. Superdrug also operates in the Republic of Ireland and as such all products supplied to Superdrug must also adhere to the Empowering Consumers for the Green Transition) Directive (EU 2024/825) ("EmpCo Directive").

We expect our trade suppliers to uphold our standards by complying with this policy when making "Green Claims" in the content they provide to us about the products and services they supply for sale and promotion in our stores, on our websites, and when these products and services are promoted across our marketing channels.

## Scope

All trade supplier content provided to Superdrug for the sale and/or promotion of products and services by Superdrug or Savers in store, online or via Marketplaces.

Green Claims are statements, symbols, or images that suggest a product, service, or brand is beneficial or less harmful to the environment. These can appear on packaging, product descriptions, advertising, or social media. Examples of Green Claims are "eco-friendly", "sustainable" and "carbon neutral".

## 6 Key Principles – Green Claims Code

The UK's Competition and Markets Authority ("CMA") has created the "Green Claims Code" to help businesses make clear, accurate and evidence-based Green Claims.

The Code contains 6 key principles to follow when making Green Claims:

1. Be truthful and accurate – Claims must reflect the actual environmental impact.
2. Be clear and unambiguous – Use plain language; avoid vague terms. The meaning that a customer is likely to take from a product's messaging and the credentials of that product should match.
3. Do not omit or hide important information – Disclose limitations and scope. Claims must not prevent a customer from making an informed choice because of information left out.
4. Make fair and meaningful comparisons – Only compare like-for-like products.
5. Consider the full lifecycle – Businesses must consider the total impact of a product or service. Green claims can be misleading where they don't reflect the overall impact or where they focus on one aspect of it but not another.
6. Be substantiated – Businesses should be able to back up their claims with robust, credible and up-to-date evidence.

## EmpCo Directive Requirements for Ireland

The EmpCo Directive additionally requires for Green Claims to be checked and verified by independent, accredited assessors or organisations, and that all substantiating documents must be made available to consumers or competent authorities on request.

## Trade Supplier Responsibilities

1. When making a Green Claim, it must adhere to the Green Claims Code (more details of which can be found here: [The Green Claims Code checklist - GOV.UK](#)).
2. You must not use any ambiguous or unsubstantiated words, icons, or catchphrases. The following words are examples of problematic words or phrases; this is not an exhaustive list.

<b>Planet based statements</b> including Planet-friendly, Planet loving, Better for the planet, Earth-conscious, Kind to the planet
<b>Eco friendly terminology</b> including Eco-friendly, Eco, Eco-conscious, Eco-positive
Use of vague terms such as <b>Sustainable, Clean Beauty, Conscious Beauty</b>
<b>Use of the colour Green</b> to promote environmental benefit including Green Materials, Greener
Use of the term <b>responsible</b> to promote benefit such as Environmentally Responsible, Responsible Beauty, Responsible materials
<b>Climate</b> claims such as Carbon Neutral, Climate-smart, Nature-positive, Carbon Saving

If you do use any ambiguous or unsubstantiated words, then Superdrug reserves the right to reject the product being listed until the Green Claim is removed.

3. You must ensure that for all Green Claims being made you retain supporting evidence, such as written substantiation (e.g. lifecycle assessments, 3<sup>rd</sup> party certifications, or technical specification documents), which is made available to us upon request. Details of acceptable 3<sup>rd</sup> party certification and/or verification can be found in the EU EmpCo directive.

*An example of this would be the use of 100% Sustainable Palm oil – to use this statement, you must be able to demonstrate that your product contains 100% RSPO Sustainable Palm oil via certification.*

4. You must train all your relevant teams on the CMA Green Claims Code / EmpCo Directive and responsibilities to ensure compliance with fair consumer practices.

We are committed to ensuring this policy remains current and effective and it will be reviewed regularly to reflect evolving regulations and best practice. We encourage all our trade suppliers to work collaboratively with us and to contact us with any questions or if support is needed to meet the standards set out in this policy.