De'Longhi Australia Pty Ltd

AUSTRALIAN PACKAGING COVENANT

ACTION PLAN: 2010-2016

UPDATED JUNE 2015

DēLonghi Group









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1 EXECUTIVE SUMMARY

De'Longhi Australia Pty Ltd is a signatory of the Australian Packaging Covenant (APC) as a brand owner and a member of the packaging supply chain.

The purpose of this revised Action Plan is to update the APC and associated stakeholders as to how De'Longhi Australia has progressed towards the Covenant's goals and what further actions we aim to implement during the APC extension until June 2016.

Over the last five years, De'Longhi Australia has implemented a number of important initiatives relating to our packaging, including:

- Sustainable Packaging Guideline (SPG) audits completed on products accounting for upwards of 70% of the packaging types we place on the Australian market.
- SPG audits now recorded in a secure, cloud based, storage and audit tool which enables staff to collate and collaborate across the world on SPG information in one shared file.
- A detailed review of waste arising on our premises and waste management practices, ensuring that all recyclable materials are handled and stored to maximise their suitability for recycling, while all non-recyclable materials are separated and diverted to landfill. A more detailed review of this waste plan is included in this document under Section 5.0.

This progress has helped us to enhance communication and cooperation with our European Headquarters, which controls most of the environmental decisions around packaging for De'Longhi Australia. Our European operations now have access to our online SPG assessment tool that will allow for greater co-operation when completing individual assessments going forward.

De'Longhi Australia are looking to develop further initiatives regarding our onsite waste packaging for our warehouse operations. These initiatives will be supported by all our staff and focus on achieving the Covenant's three performance goals throughout our packaging chain, including:

- 1. **Design:** Extend our work with our overseas Head office to carry out our Sustainable Packaging Guideline audits at the design stage so any material or resource minimisation can be implemented in the production stage.
- 2. **Recycling:** Enhance recycling rates for packaging waste associated with the distribution and sale of our products.
- 3. **Product Stewardship**: Continue to consider packaging disposal options and broader sustainability initiatives throughout our distribution network and for our end consumers.

Following the recommendations set out in our waste management report earlier this year, our next steps will be to include procedural and infrastructure changes at our warehouse in Prestons, to accommodate our increased recycling rates.

De'Longhi Australia will also continue to work towards having an Environment Management System in accordance with ISO 14001 to allow for greater comparison of site-based environmental initiatives with our Head Office who are externally certified to ISO 14001.

2 THE DE'LONGHI GROUP

2.1 ABOUT DE'LONGHI

The De'Longhi Group is an international leader in domestic and commercial appliances, offering consumers a distinctive combination of style and performance. The company is headquartered in Treviso, Italy and operates five production facilities which are based in Italy (3), China (1) and Russia (1). The De'Longhi group also has sales subsidiaries throughout America, Europe and Asia-Pacific.

2.1.1 HISTORY

The company was founded by the De' Longhi family in 1902 as a small industrial parts manufacturing workshop, incorporating in 1950. Historically a major producer of portable heaters and air conditioners, the company has expanded to include nearly every category of small domestic appliances in coffee, food preparation and cooking industry, as well as household cleaning and ironing.

2.1.2 EXPANSION

In 2001 De'Longhi's acquired the British appliance maker Kenwood which expanded its reach in the food preparation area and secured its position as the leader in the kitchen machine category. De'Longhi continued its expansion and in 2013 bought the rights to Braun household products from Procter & Gamble.

2.1.3 CURRENT STRUCTURE

Today, the De'Longhi Group is one of the world's largest appliance manufacturers employing over 6,000 people in 65 countries with a turnover of more than \$AUD 2 billion per annum. The De'Longhi Group is present in 33 countries with direct commercial subsidiaries and sells its products to countries all over the world. The company is listed on the Italian Stock Exchange, Borsa Italiania.

De'Longhi is very proud to dominate market segments in the following categories:

- Portable Heating
- Air Conditioning and Air Treatment
- Fully Automatic Coffee Machines
- Food Preparation and Cooking
- Home cleaning and ironing

2.2 De'Longhi Australia

De'Longhi Australia is a sales subsidiary of the De'Longhi Group, importing and distributing domestic appliances throughout Australia. Operating since 2003, De'Longhi Australia has ownership of three brands: De'Longhi, Kenwood and Braun.

The company employs 94 people in Australia (85) and New Zealand (9)

For the most part, De'Longhi Australia has no control or influence over the packaging applied to our products overseas, as this is specified by our Head Office in Italy. Nevertheless, there are circumstances where we repackage products, when they are either refurbished or classed as seconds.

3 ACTION PLAN COMMITMENT

3.1 OUR APC TEAM

Since 2010 De'Longhi has consistently had senior management involvement and support in all aspects of meeting the Australian Packaging Covenant's reporting requirements including:

- 1. The preparation of our initial Action Plan;
- 2. Involvement in four Annual Reports submitted to date;
- 3. Involvement in the assignment of resources, and participation in the completion of our Sustainable Packaging Guidelines Assessments;
- 4. Support for and input to this updated Action Plan to reflect the progress made since the first APC reporting period;
- 5. Involvement in the recent Waste Management review of our facilities in Prestons; and
- 6. Installation of our new software solution to manage our Sustainable Packaging Guideline assessments.

Our APC working Team includes but is not limited to:

Name:	Responsibility:
Alan Frettingham	Service Technical and Compliance Manager (Australia)
Paulo Altertoni	CEO (Australia)
3 rd Party	Consultants

3.2 APC CONTACT OFFICER

Mr Alan Frettingham, Service Technical and Compliance Manager, is the APC contact officer with responsibility for ensuring De'Longhi Australia's commitment to the Australian Packaging Covenant is met. He reports the Mr Paulo Albertoni, CEO of De'Longhi Australia, on all matters relating to the APC.

Alan Frettingham Service Technical and Compliance Manager De'Longhi Australia Pty Ltd Unit 3A, 43-47 Lyn Parade Prestons, NSW 2170

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3.3 CEO ENDORSEMENT

I endorse this updated Action Plan as a public document detailing De'Longhi Australia's ongoing commitment to meeting its obligations as a signatory to the Australian Packaging Covenant.

Paulo Altertoni CEO(Australia)

4 DE'LONGHI GROUP'S SUSTAINABILITY APPROACH

As one of the world's leading companies in the domestic appliance industry, De'Longhi recognises our role in adopting and promoting sustainability standards throughout the global value chain. The group's main manufacturing site in Treviso, Italy has implemented an Environmental Management System (EMS) to provide a framework for robust environmental management and to drive continuous environmental improvement. This has been externally certified to ISO 14001 Environmental Management Systems Standard.

As part of the EMS and the group's wider sustainability strategy, a number of environmental initiatives have been implemented. These include:

- The installation of a photovoltaic system to produce renewable energy at our production plant in Mignagola, Italy
- A move towards online appliance instruction manuals to reduce paper consumption
- Replacement of polystyrene packaging with moulded compressed cardboard, where viable, and
- Product rationalisation to minimise the packaging of spare parts and the associated transport impact.

The De'Longhi Group is also a member of CONAI, a private consortium of firms working towards the recovery and recycling of packaging purchased by Italian consumers. As with the APC, CONAI has a strong focus on sustainable packaging design and improved rates of recovery and recycling for packaging after use.

Through CONAI, De'Longhi, also participate in the Pensare Futuro (Thinking Future) project for waste prevention propagation which aims to improve the eco-compatibility of packaging. One of the outcomes of this project is the Prevention Dossier, in its third edition. This is a collection of examples of environmentally virtuous packaging presented by producer and user companies.

Our participation in CONAI also facilitates our SPG analysis and assessments of improved packaging solutions into the future.

It is important for the company as a whole to foster good environmental stewardship in all countries where we have operations, whether these be manufacturing or distribution/retail. At a minimum, this requires full compliance with all local environmental legislation. We adhere to all relevant European Union Directives for appliance manufacturing and distribution, including Restriction of Hazardous Substances in electrical and electronic products (RoHS), and Registration, Evaluation, Authorisation, and Restriction of Chemical substances (REACH).

In terms of packaging, for our Head Office this relates to the European Packaging and Packaging Waste Directive (Directive 94/62/EC). This Directive aligns broadly with the principles of the APC, and facilitates our access to robust packaging data for products imported into Australia.

4.1 GROUP HEADQUARTER INDUSTRY ASSOCIATIONS

A summary of particular industry associations and related programs which our Group's Italian headquarters is a member of are summarised below:

European Committee for Domestic European Manufacturers (CECED)	Promotes the Appliance industry's mission to increase product innovation while reducing the environmental impact of appliances
CONAI	private consortium of firms working towards the recovery and recycling of packaging purchased by Italian consumers
Green Dot	European-based symbol indicating the product manufacturer has contributed financially towards the cost of recovering the packaging of that product.
Italian Association for Quality Culture (AICQ)	

4.2 AUSTRALIAN TRADE ASSOCIATIONS

In Australia, De'Longhi has been member of the APC since 2010 and was also a signatory to the National Packaging Covenant (NPC) since 2005. De'Longhi Australia is committed to promote the APC goals of sustainable packaging design, recycling and product stewardship, which underpin our drive towards environmental best practice.

APC membership, and its associated obligations, has helped De'Longhi Australia enhance communication and collaboration on packaging and broader sustainability issues throughout our network, allowing us to fully capitalise on the resources and expertise that are available throughout the De'Longhi Group.

De'Longhi Australia also recognises the importance of industry associations to help keep us informed of both legislative and market driven requirements. Therefore, we are engaged with the following programs and associations:

Name	Details	Region
Consumer Electronics	Focused on regulatory, technical and commercial issues for	De'Longhi Australia
Suppliers Association	electronic goods supplied to the Australian market.	
(CESA)		
Australian Industry	Formerly the "Australian Electronics and Electrical	De'Longhi Australia
Group	Manufacturers' Association" (AEEMA)	
Australian Compliance	Industry benchmark for professionals working in the field of	De'Longhi Australia
Institute (ACI)	Governance, Risk and compliance	
Australian Packaging	A sustainable packaging initiative which aims to change the	De'Longhi Australia
Covenant	culture of business to design more sustainable packaging, increase recycling rates and reduce packaging litter.	

5 SUMMARY OF WASTE REPORT

In June 2015 De'Longhi commenced a review of De'Longhii Australia's waste practices at our warehouse in Prestons, NSW.

This project took the following approach:

- 1. Initial meeting and discussion around waste as a subject in De'Longhi Australia;
- 2. A site walk-through to review waste practices first hand;
- 3. Engagement with a number of staff involved at the disposal and collation stages of the waste process; and
- 4. In depth desktop analysis of waste information provided by the main waste contractors; and
- 5. Analysis of waste stream inputs compared to industry best practice.

This level of review will help De'Longhi to reconcile any disparity between:

- Waste arisings and type of facilities provided;
- Waste contractor records compared to De'Longhi's own estimates;
- Waste disposal routes compared to current outcomes.

The waste review is ongoing and aims to address all issues raised above with the recommendations that a follow up waste audit is carried out every six months after the implementation of this plan as part of an expanded Environment Management System at the Prestons facility.

The main outcomes from this review to date are a series of recommendations over the short, medium and long term to improve waste management practices. This will be fully documented in a company-wide Waste Implementation Plan.

De'Longhi Australia's Prestons site has proven to have a very clean waste stream that results in a high percentage of recycling. All facilities are in place to support the segregation of waste on the premises and also reduce the frequency of lifts for the Recycling bins.

Staff education around Avoid/Reuse/Recycle/Disposal in relation to the waste stream will be implemented in De'Longhi Australia through the simple routes of emails, intranet and staff notice boards.

6 SUSTAINABLE PACKAGING GUIDELINES (SPG)

De'Longhi Australia has identified our product lines as the most appropriate method to review packaging. We have allocated the staff, time and systems necessary to ensure this is carried out on an ongoing basis through continuous product development protocols.

In many instances the packaging materials used in one product line will be applicable across a wide range of products when considering De'Longhi's Sustainable Packaging Guideline assessments. For example, a standard cardboard box with crushed cardboard insert is used to pack many of our domestic appliances. De'Longhi Australia will contact our main environmental and packaging teams to ensure we are making the correct assumptions when conducting an assessment. Our assessment process allows for our Head Office to directly contribute to our SPG files online, creating a seamless reporting structure between our environmental/packaging staff and our reports to the Australian Packaging Covenant in Australia.

6.1 BRAND PROFILES

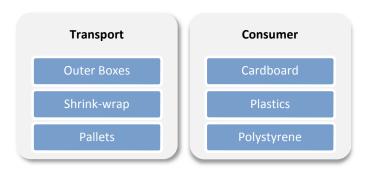
De'Longhi Australia has ownership of three brands, De'Longhi, Kenwood and Braun.





6.2 Types of Packaging Used

De'Longhi's product packaging consists mainly of the following materials:



6.2.1 CORRUGATED CARDBOARD

Most cardboard boxes used for refurbished products packaging contain 99% recycled content, with the exception of the top layer of the boxes which consists of 'kraft' or virgin fibre board to strengthen the box for stacking purposes and to maintain product integrity.

6.2.2 PLASTIC MATERIAL

This includes shrink wrap, box strapping, bubble wrap, and Expanded Polystyrene (EPS).

Plastic shrink wrap is collected and recycled using separate collection bins in the warehouse. A specialist company picks up these bins for recycling.

Expanded Polystyrene (EPS) is utilised for internal packaging to prevent damage to fragile and heavy products such as ovens and cooktops.

Plastic material is reused where possible to repackage 'seconds' and refurbished products.

6.2.3 WOODEN PALLETS

Wooden pallets are received at the De'Longhi Australia warehouse through arrival of shipments from De'Longhi Italy.

Wooden pallets are also used to transport products from the De'Longhi Australia warehouse to retailers and resellers across Australia.

7 Australian Packaging Covenant Progress to Date

As a signatory to the APC, De'Longhi Australia has made annual financial contributions to the Covenant Fund, as well as completing an Action Plan and four Annual Reports.

In regard to our Sustainable Packaging Guidelines (SPG) obligations, De'Longhi Australia has conducted SPG assessments on our main packaging types that account for upwards of 70% of our major consumer packaging lines. We have also moved our SPG audits to a secure, cloud based, tool which enables staff globally to collate and collaborate on audit information in one shared file.

This has helped us to:

- Make De'Longhi Head office and sustainability department aware of De'Longhi Australia's APC commitments
- Communicate our APC reporting and information requirements to our Head Office as part of the ongoing process of building global information
- Highlight the efficiencies of our onsite logistics through reuse of internal secondary packaging, and
- Record the actions De'Longhi take onsite to ensure that all recyclable materials removed from our products are removed from the waste stream and sent for recycling.

More specifically, we have made progress in areas targeted in our previous Action Plan (2010-2015) which are set out in detail in the Action Plan Tables below and our Annual Reports.

This involved a detailed waste audit at our main warehouse at Prestons to analyse waste inputs - such as recyclables, non-recyclables, compostables and random office waste - and ensure effective and efficient waste management practices.

As the majority of our packaging is designed and applied overseas, De'Longhi Australia's influence on the packaging placed on the market in Australia is limited. Therefore, our focus needs to centre upon the areas over which we have control; we can ensure our onsite waste is managed correctly and inform customers (e.g. through the use of relevant logos) how they can dispose of our consumer packaging in an environmentally sustainable way.

8 ACTION PLAN TABLES

8.1 Introduction

The purpose of these Action Plan tables is to show how De'Longhi Australia intends to contribute to the achievement of the Covenant's goals and continue to meet De'Longhi Australia's obligations under the Covenant, which the APC has been extended to June 2016.

The Action Plan tables address the three performance goals of the Australian Packaging Covenant which are:

- 1. Performance Goal 1: Design Optimise packaging to achieve resource efficiency and reduce environmental impact.
- 2. Performance Goal 2: Recycling The efficient collection and recycling of packaging.
- 3. Performance Goal 3: Product Stewardship Demonstrated commitment to product stewardship.

In turn, the tables also address all Key Performance Indicators (KPIs) of the Australian Packaging Covenant.

While milestones have been set against specific actions within each KPI section, De'Longhi Australia will continue to report annually on many of these Actions, even when the initial Milestone date has passed.

At the start of each section, we highlight specific outcomes achieved since the commencement of the previous Action Plan in 2010.

8.2 DESIGN

De'Longhi has completed Sustainable Packaging Guideline audits on our main packaging types that account for upwards of 70% of the packaging we supply. We will continue to meet our commitments in this area for the extended period of the APC in June 2016, by which stage we should be at 100% completion.

Changes to packaging design for many of our household appliances have resulted in the reduction of polystyrene use. While previously used as an insert on all appliances, polystyrene is now only used on expensive coffee and kitchen machines. The majority of other household appliances use crushed cardboard instead.

De'Longhi now hold all SPG audits and communications, along with supporting third party information, in a single secure online tool which all relevant De'Longhi staff can access. As the information is received, it is entered into the system providing a full audit trail for each packaging material audit.

De'Longhi Head Office has been made aware of our APC commitments and our SPG audits and interact with De'Longhi Australia as a member of the APC Team tasked with implementing this Action Plan.

De'Longhi Australia continues to communicate our APC and SPG reporting and information requirements to our Head Office as part of the ongoing process of building environmental information for the group, globally.

All our packaging is specified by our Head Office in Italy for a global market. While this limits our ability to influence packaging decisions, De'Longhi Australia also sees this as an opportunity to benefit from the collective expertise of our international branches. The packaging we distribute in Australia is of a standard that must comply with a range of packaging compliance requirements in other countries, e.g. the European Packaging and Packaging Waste Directive.

*Please note that De'Longhi Australia understands the requirement of reporting annually, where applicable, on the progress of Actions beyond the initial dates shown in the Milestones column.

Performance goals and KPIs	Actions	Responsibility	Baseline data	Targets	Milestones*				
1. Design - optimise packaging	1. Design - optimise packaging to achieve resource efficiency and reduce environmental impact								
KPI 1 – Proportion of signatories in the supply chain implementing the SPG for design or procurement of packaging. ¹	Liaise with global headquarters to document and report any actual or attempted changes to packaging identified as part of the SPG reviews or otherwise, including quantifiable data.	APC Team	No formal documentation process in place	Changes documented and reported annually. Recent changes include replacement of polystyrene inserts with crushed cardboard.	Ongoing				
	Review existing products to ensure that they meet SPG guidelines		No SPG audit procedure in place	100% reviewed	70% complete as of 31 st May 2015				
	Liaise with Headquarters to obtain insight into European Packaging policy		No information	Policy in Australia informed by Europe	December 2015				
	Review new products to ensure they meet SPG guidelines		No SPG procedure in place	100% reviewed	30 th June 2015				
	Implement adequate audit procedures and tools to record and share the results of the SPG reviews with various parties across the De'Longhi group worldwide.		No audit procedure or common tool in place	Cloud based tool in place to record audit procedure and capture data.	May 2015				
	Monitor progress of SimaPro LCAs undertaken by De'Longhi Italy		No LCA process in place	LCA results obtained and incorporated into product/packaging design	Dec 2012				

¹ Target: 70% of Covenant signatories with documented policies and procedures for evaluating and procuring packaging using the SPG or equivalent. Target: 70% of Covenant signatories assessing 100% of new packaging and 50% of existing packaging against the guidelines.

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Develop 'Responsible Supplier Register' to record sustainability information about key suppliers		'Responsible Supplier Register' established	Jun 2012
Undertake packaging rationalisation project to optimise carton sizes for spare parts and repackaged goods		Rationalisation completed	December 2011

8.3 RECYCLING

Since our original Action Plan was prepared in 2010, we have conducted a detailed waste review, with the support of third party consultants. The main goal of this review was to enhance our understanding of waste arising across our products and departments and enhance waste minimisation and recycling measures throughout our operations.

De'Longhi Australia continues to document our onsite waste information. Our warehouse in Prestons has an excellent recycling programme in place ensuring the careful management of all secondary packaging arising onsite. This comprises cardboard, paper, mixed plastics and shrink wrap and is segregated and removed on a scheduled lift.

Office paper waste and ink cartridges are recycled and all paper towels and plastic water bottles are removed from our office waste stream.

De'Longhi Australia has a localised purchasing policy which applies to packaging for refurbished products only. While this has been adopted on an adhoc basis to date, it will be implemented formally over the next year, during the APC extension period to June 2016.

The policy specifically favours the purchase of packaging that:

- contains the highest percentage of post-consumer recycled content,
- reduces waste,
- is recyclable or compostable, and
- assists De'Longhi fulfil our obligations under the APC.

To ensure these actions are auditable, De'Longhi evaluates and documents progress by comparing annual figures against baselines for each of our waste streams e.g. recycling, non-recycling, compostables and reuse.

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*Please note that De'Longhi Australia understands the requirement of reporting annually, where applicable, on the progress of Actions beyond the initial dates shown in the Milestones column.

Performance goals and KPIs	Actions	Responsibility	Baseline data	Targets	Milestones*			
2. Recycling - the efficient collection and recycling of packaging								
KPI 3 – Proportion of signatories with on- site recovery systems for recycling used packaging.	Engage an external partner to conduct detailed waste management review for the Prestons warehouse	APC Team	No detailed review available	External waste management review completed	2011, 2015			
	Document baseline recycling information for on-site packaging waste at Prestons facility		Baseline information in place	Annual information compared to baseline information on a continuous basis	Ongoing			
	Report annually on recycling of on-site packaging waste at Prestons and maintain or exceed the current recycling rate.		Report developed	Report annually to APC.	Ongoing			
	Develop systems to recycle timber waste (pallets & skids)			Pallet recycling solution developed	Jun 2011			
	Investigate possibility of implementing a Group level Buy recycled policy			Decision on 'Buy Recycled' policy made				
	Establish environmental impact		No committee in place	Committee established	Ongoing			

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	committee to oversee & promote recycling initiatives Identify opportunities for office waste recycling (additional waste streams)		Limited recycling facilities available	to have regular meetings with minutes recorded for follow-up. Recycling facilities available in all staff areas	
KPI 4 - Proportion of signatories with a policy to buy products made from recycled packaging. All APC signatories will have a formal, documented policy of buying recycled products or materials.	Review existing Buy Recycled Policy to identify possible improvements to the document. Review existing list of purchases to identify items with recycled	APC Team APC Team	Existing policy in place. No list of purchases in place.	Reviewed Buy Recycled Policy approved and in place. Complete review, and list items	Ongoing
	content currently being procured, including items for office use.			containing recycled content.	
	Identify opportunities to purchase items with increased recycled content.	APC Team	Purchasing profile unknown.	Consider products containing recycled content where cost and functionality are equal to current products.	September 2015

8.4 PRODUCT STEWARDSHIP

The majority of packaging that is specified by our Group Head Office will be assessed under their Environmental Management System (EMS) in a bid to minimise the associated environmental impacts. In this case De'Longhi Australia will benefit from any progress made in our global packaging chain.

Our Global Sustainability department has also been given access to our online SPG tool so they can directly input information to our central database, and also use this information in other initiatives they might find useful such as Sustainability Reporting and their EMS.

In regard to onsite litter management at our premises in Prestons, De'Longhi Australia has a number of OHS and workplace operational standards in place that encourages good waste management practices, and the proper maintenance of the facility as a working environment. This quarantees that there are no materials left lying around that can become a hazard in the form of litter.

We maintain a good relationship with our local council and neighbouring tenants and have never had a complaint relating to litter from our premises.

Our products are sold through a range of retail outlets across Australia. All these premises have waste and recycling facilities onsite to ensure there are no litter issues. As a retail outlet or major department store one of their main objectives is to provide a positive shopping experience and this involves the constant management and removal of litter.

*Please note that De'Longhi Australia understands the requirement of reporting annually, where applicable, on the progress of Actions beyond the initial dates shown in the Milestones column.

Performance goals and KPIs	Actions	Responsibility	Baseline data	Targets	Milestones*
3. Product Stewardship - demonstr	ated commitment to product stewardship)			
KPI 6 – Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging. ²	Engage with global headquarters to ensure existing products meet the SPG requirements	APC Team	No engagement prior to being an APC signatory	Active involvement of Head Office with meetings minuted, emails retained and outcomes reported annually	Ongoing
	Develop and issue contracts which give preference to `responsible suppliers' whose performance incorporates sustainability criteria.	-	No sustainability statement requirement in place	Requirement for sustainability statement to be incorporated into all new contracts in place.	June 2015
	Engage with retailers to identify reverse logistics opportunities.			Retailers engaged	June 2013
	Develop a reverse logistics implementation program in collaboration with retailers			Reverse logistics program implemented	June 2014
KPI 7 – Proportion of signatories demonstrating other product stewardship outcomes	Support industry and community waste and recycling events and initiatives wherever applicable to demonstrate our commitment to reducing waste.		No events supported	Ongoing participation with annual increase in total participants.	Ongoing
	Continue inventory management programme to reduce storage of obsolete, defective stock			Inventory management program continued	Ongoing

² Target: 70% of Covenant signatories implementing formal policies and procedures in working with others to improve design, procurement and recovery of packaging.

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Undertake EMS gap analysis for		Gap Analysis	12/11
Australian operations		completed	
Conduct review of this Action Plan		Review and update	Mar 2013
		action plan	and Jun
			2015

^{*}Please note that De'Longhi Australia understands the requirement of reporting annually, where applicable, on the progress of Actions beyond the initial dates shown in the Milestones column.

Performance goals and KPIs	Actions	Responsibility	Baseline data	Targets	Milestones*			
3. Product Stewardship - demonstra	3. Product Stewardship - demonstrated commitment to product stewardship							
KPI 8 – Reduction in the number	Proper waste and litter management practices and procedures in place across all sites.	APC Team	Ensure proper waste and litter management practices are in place at all sites.	Litter management system in place for all sites and reported against annually.	Ongoing			
of packaging items in litter.	Provision of information relating to litter on our products.		SPG audits identify litter and recycling symbols on packaging imported into Australia.	Appropriate symbols is clearly shown on all packaging for products imported into Australia.	Ongoing			

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