

Annual Report and Action Plan

Company Name: **COMSOL PTY LTD**

Trading As: **COMSOL PTY LTD**

ABN: **48069997422**

About APCO

Australian Packaging Covenant Organisation (APCO) is a co-regulatory not-for-profit organisation leading the development of a circular economy for packaging in Australia. APCO's vision is a packaging value chain that collaborates to keep packaging materials out of landfill and retains the maximum value of the materials, energy and labour within the local economy.

Each year, APCO Brand Owner Members are required to submit an APCO Annual Report and an APCO Action Plan. This document is the Annual Report and Action Plan output for the organisation listed above. This document provides the overall performance level of the organisation, as well as any commitments they have made to work towards on their packaging sustainability journey. This document may also include additional information provided by the Member in their report.

Overall Performance **Beyond Best Practice**

The chart below indicates the overall performance level of this organisation listed above in the 2025 APCO Annual Report. The organisation's reporting period was **January, 2024 - December, 2024**.



Understanding APCO Annual Reporting performance levels:

- 1 Getting Started:** You are at the start of your packaging sustainability journey.
- 2 Good Progress:** You have made some first steps on your packaging sustainability journey.
- 3 Advanced:** You have taken tangible action on your packaging sustainability journey.
- 4 Leading:** You have made significant progress on your packaging sustainability journey.
- 5 Beyond Best Practice:** You have received the highest performance level and have made significant progress on your packaging sustainability journey.

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Additional Information

The information below indicates additional information that the organisation included in their APCO Annual Report.

Describe initiatives, processes or practices that you have implemented during your chosen reporting period that have improved packaging sustainability

Comsol implemented a wide range of sustainability actions throughout the 2024 reporting period, including:

- > Finalised the transition to FSC-certified fibre-based retail packaging across 100% of SKUs, primarily using FSC Mix.
- > Maintained 100% ARL labelling compliance, with PREP Tool assessments completed for all 225 SKUs.
- > Resolved a temporary packaging deviation involving unplanned BOPP film usage through a full supplier audit, public transparency announcement, and updated Quality Assurance oversight.
- > Introduced a robust SQL-based packaging material tracking system, allowing real-time analysis of packaging weights by material type, year, and division.
- > Eliminated all legacy PVC, EPS, plastic ties, and plastic inserts, with mono-material recyclable packaging replacing all multi-material formats - across retail, commercial and transport packaging.
- > Expanded our use of GRS-certified recycled LDPE in our B2B commercial packaging for accessories, providing verified post-consumer content to commercial partners.
- > Ongoing benefits from warehouse waste segregation systems, with a cardboard crusher and plastic bale infrastructure installed, improving recovery outcomes for operational packaging waste.
- > Rolled out a complete packaging redesign and rebrand aligned with the SPGs, focused on creating a sleek, modern, and consumer-centric look. The updated designs feature clear callouts, high visibility ARL labelling, and messaging that improves end-of-life clarity for customers.
- > Refreshed our retail channel strategy, allowing our premium retail packaging to be sold nationwide. This strategic change improves access to sustainable packaging and premium product experiences across all Australian retail outlets.

Describe any opportunities or constraints that affected performance within your chosen reporting period

A key constraint in 2024 was the limited visibility over the exact proportion of recycled fibre within FSC Mix material due to supplier-level variance and lack of third-party verification prior to FSC implementation. This affected our ability to confidently report recycled content despite the strong sustainability credentials of FSC.

Additionally, operational landfill volumes appeared disproportionately high due to fixed contractual bin pickups (i.e., size 4 general waste bins collected weekly regardless of fill level), limiting the diversion rate percentage despite continued waste segregation efforts.

However, the full implementation of SQL tracking systems created new opportunities to improve internal reporting precision and transparency, while our award-winning educational initiative Closing The E-Loop strengthened external partnerships and literacy around sustainable packaging and electronic products.

Please use the space below to provide examples or case studies of exemplary packaging sustainability conducted by your organisation.

Rebrand and Packaging Redesign:

> As part of a broader brand refresh, Comsol redesigned all packaging with a focus on visual clarity, consumer education, and sustainability. Aligning with SPGs, the new design maximises mono-material recovery through clear callouts, use of the ARL, and packaging protection with zero-plastic. This design was rolled out nationally and represents a new standard for Comsol's fibre-based retail packaging.

Recycled Content in Transport Packaging:

> Comsol tracks recycled content in transport packaging, and in the commercial B2B side of the business including GRS-certified recycled LDPE polybags for B2B channels and recycled corrugated board in shipping cartons. These materials contribute to total emissions reductions and are integrated into Comsol's internal packaging emissions models.

Educational Leadership through 'Closing The E-Loop':

> The award-winning initiative 'Closing The E-Loop' provides schools and businesses with accessible education on e-waste and sustainable design. Through the Sustainable Electronics Solutions video showcase, experts across the electronics supply chain— with a focus on packaging (namely, APCO, National Retail Association and Grounded Packaging)—provide case studies and circular economy insights. This has reached over 21,000 students and supported APCO-aligned education at scale.

Supply Chain Engagement and SQL Tracking:

> Internally, Comsol's SQL-based systems allow detailed analysis of packaging use, emissions, materials, and lifecycle attributes. Our Packaging Material Certification Document ensures suppliers disclose certifications, material types, and recovery pathways. This has supported robust governance, packaging phase-out strategies, and internal reporting against APCO guidelines.

APCO Action Plan Commitments

For each of the Packaging Sustainability Framework criteria listed below, a description is provided along with the commitments made by the organisation in their APCO Action Plan.

Criteria 1:

Governance & Strategy:

This criteria considers actions to integrate packaging sustainability into business strategies.

- Develop a strategy that includes goals (objectives) and targets for packaging sustainability that addresses the Sustainable Packaging Guidelines (SPGs) or equivalent.
- Include a commitment to achieving the 2025 National Packaging Targets in our strategy.
- Have our executive or board of directors review our strategy and have the strategy integrated within our business processes.
- Regularly communicate and promote packaging sustainability objectives and targets within our organisation.
- Regularly engage or communicate with our external stakeholders about the environmental impacts of our packaging.
- Actively participate in initiatives to promote packaging sustainability outside of our organisation.

Criteria 2:

Design & Procurement:

This criteria considers actions taken to ensure that sustainability principles are considered in the design or

procurement of both new and existing packaging through use of the Sustainable Packaging Guidelines (SPGs).

- Review **100%** of our packaging against the Sustainable Packaging Guidelines (or equivalent).
- Improve the accuracy of our data regarding reviews of packaging using the Sustainable Packaging Guidelines (or equivalent).
- Consider the following Sustainable Packaging Principles in our packaging reviews:
 - Design for recovery
 - Optimise material efficiency
 - Design to reduce product waste
 - Eliminate hazardous materials
 - Use of renewable materials
 - Use recycled materials
 - Design to minimise litter
 - Design for transport efficiency
 - Design for accessibility
 - Provide consumer information on environmental sustainability
- **100%** of our packaging to be optimised for material efficiency.
- Improve the accuracy of our data regarding packaging material efficiency.

Criteria 3:

Recycled Content:

This criteria considers actions taken to increase or optimise the amount of recycled material used by your organisation.

- Develop a policy or procedure to buy products and/or packaging made from recycled materials.
- Use recycled content in:
 - Primary packaging that we use to sell our products
 - Secondary packaging that we use to sell our products
 - Tertiary packaging that we use to sell our products
- **100%** of our packaging to be made using some level of recycled material
- Improve the accuracy of our data regarding use of recycled materials.

Criteria 4:

Recoverability:

This criteria considers actions taken to improve the recovery of packaging at end-of-life and increase use of reusable packaging.

- **97%** of our packaging to be designed to have all packaging components be recoverable at end-of-life.
- Improve the accuracy of our data regarding recoverability.
- Use PREP to assess the recyclability of our packaging through kerbside collection in Australia and/or New Zealand.
- Investigate opportunities to use reusable packaging.

Criteria 5:

Disposal Labelling:

This criteria considers the extent to which packaging has been labelled to help consumers determine what to do with packaging at end-of-life.

- 100% of our packaging to have on-pack labelling to inform correct disposal.
- Improve the accuracy of our data regarding labelling.

Criteria 6:

On-site Waste:

This criteria considers progress in increasing the amount of on-site solid waste being diverted from landfill.

- Have recycling programs for the following materials:
 - Paper/cardboard
 - Soft plastics
 - Rigid plastics
 - Glass
 - Non-CHEP pallets received on-site are collected and managed by a licensed resource recovery partner to ensure appropriate reuse or recycling. Additionally, coffee pods used in workplace kitchens are collected through a dedicated coffee pod recycling program, diverting this waste from landfill.
- Aim for 57% of our on-site waste to be diverted from landfill.
- Improve the accuracy of our data regarding on-site waste.

Criteria 7:

Problematic Materials:

This criteria considers the extent to which organisations are actively phasing out problematic and unnecessary single-use plastic packaging and preventing/reducing litter.

- Help reduce litter by:
 - Delivering a litter education campaign
 - Comsol delivered an e-waste focused education campaign through its national sustainability initiative, Closing The E-Loop, promoting e-waste prevention, recovery, and responsible disposal.
As part of this, Comsol collaborated with Clean Up Australia to support the "E-Waste Hunt" campaign, encouraging Australians to locate and properly dispose of forgotten electronics in their homes, helping prevent litter and landfill leakage.
The campaign was further supported by participation in International E-Waste Day
Additional community involvement included Planet Ark's National Recycling Week, where Comsol promoted sustainable electronics solutions including responsible packaging and product design via Closing The E-Loop

As an overarching initiative, Closing The E-Loop is delivered in partnership with Cool.org and multiple industry experts to provide circular economy solutions and address litter through education and design thinking.

Key outcomes include:

- > Over 21,000 students educated in Australia, with international reach across APAC, Europe, and the Americas
- > School-based action programs, teacher resources, and curriculum-linked workshops in geography, design, and sustainability
- > The Sustainable Electronics Solutions video showcase — a first-of-its-kind, expert-led series exploring the social, environmental, and economic issues linked to e-waste and litter
- > Use of the program in international webinars, conferences, and industry panels

Recognition of the program includes:

- > Winner – World Business Forum's Green Impact Initiative
 - > Judges' Commendation – Sustainable Industrial Manufacturing Asia Pacific Awards
 - > Finalist – World Sustainability Awards 2024
- Phase-out the following problematic and unnecessary single-use plastic items: