

2015

Kongs (Aust.) Pty Ltd
Australian Packaging Covenant
Action Plan 2015-2018



Aqua One®

Avi One®

Pet One®

Pond One®

Reptile One®

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Contents

| | |
|--|-----------|
| 1. Introduction: | 3 |
| 2. Name of Organisation: | 3 |
| 3. Nature of the Organisation: | 3 |
| 4. Brands owned by the organisation: | 3 |
| Aqua One: | 4 |
| Table 1: Summary of Aqua One Products. | 4 |
| Avi One: | 4 |
| Table 2: Summary of Avi One Products..... | 4 |
| Pet One | 5 |
| Table 3: Summary of Pet One Products. | 5 |
| Pond One | 5 |
| Table 4: Summary of Pond One Products | 5 |
| Reptile One | 5 |
| Table 5: Summary of Reptile One Products | 5 |
| 5. The place of the organisation in the supply chain: | 6 |
| 6. Packaging materials and formats used by the organisation: | 6 |
| 7. The period covered by the plan: | 7 |
| 8. Contact details for the person responsible for implementing the plan: | 7 |
| 9. Action Plan | 8 |
| 10. Formal commitment by the Chief Executive Officer or equivalent, to implement the action plan. | 19 |

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1. INTRODUCTION:

Kong's Australia Pty Limited is pleased to submit the following action plan in response to the Australian Packaging Covenant's requirements for brand owners. Kong's is a new signatory to the Covenant and is committed to adopting its principles and contributing to the achievement of the Covenant key performance indicators. Background information is provided over the following pages and details of our proposed actions are documented in section 9 of the following report.

2. NAME OF ORGANISATION:

Kong's Australia Pty Limited. The head office for Australia is based at 97 Williamson Rd, Ingleburn, NSW, 2565.

3. NATURE OF THE ORGANISATION:

Kong's is a wholesaler and developer of pet care products, including, fish, dog and cat products, small animals, birds and reptiles. Kong's imports product manufactured and packaged overseas. The company therefore has limited influence over product and packaging design. However they do have important influence over product labelling to assist consumers recycle packaging.

Kong's understands how important it is to continue developing and building well recognised strong brands that consumers love and trust. Their product development and marketing teams are consistently working hard to delivering more value to our customers and partners, whilst continuing to build strong and desirable brands.

The company has had a focus on ensuring packaging associated with key product lines are designed for recyclability, with appropriate labelling to assist consumers recycle package efficiently. Head office has also had a focus on minimising waste generation, reusing and recycling waste, including packaging waste produced from its operations. The company also recycles the majority of secondary packaging (cardboard boxes) when it repackages individual items for distribution to its retail customers.

Kong's (Aust.) Pty Limited became a signatory of the Covenant in December 2014, and has received permission from the APC to submit their first annual report in March 2016. This is because there would be little to report on following the development of the action plan and the next annual reporting date, being 31 March 2015.

Kong's (Aust.) Pty Limited wishes to implement compliance programs to demonstrate how it is meeting the objectives of the Covenant.

4. BRANDS OWNED BY THE ORGANISATION:

Kong's trademarks a number of different 'One' brands in Australia. The five major brands which make up 'One Brands' consist of:

- Aqua One

- Avi One
- Pet One
- Pond One
- Reptile One

Kong's also owns the brand Aquamanta.

The majority of Kong's products are manufactured in China, and are imported and distributed wholesale to a national network of pet and pet care stores.

Aqua One:

The Aqua One range of products caters for the aquarium market. The product categories and products within each are summarised in the following Table 1:

Table 1: Summary of Aqua One Products.

| Aqua One | | |
|---------------------------------------|--|-------------------------|
| Aquariums | Canisters Filters | Wave Makers |
| Aquarium Cabinets | Automatic Top Up System | Protein Skimmers |
| Chillers | CO2Units | Hang On Filters |
| Internal Filters | Air Filters | Powerheads |
| Heaters | Thermometers/Hydrometers/Heater Protector/Leakage Detector | Air Pumps |
| Air Line Accessories | Air Line | Lighting |
| Pharmaceuticals | Test Kits | Test Pens |
| Marine Salt | Filter Media | Fish Food |
| Frozen Food | Automatic Feeders | Magnet Cleaners |
| Scrapers/Pads/Maintenance Kits | Brushes | Gravel Vacuums & Siphon |
| Plant Weights/Rock Stand/Tank Divider | Airstones | Hose |
| Tongs/Scissors | Fishnets | Pre-cut Backgrounds |
| Backgrounds | 3D Backgrounds | Gravels |
| Ornaments | Plants | |

Avi One:

The Avi One range is designed to cater for all bird keeping products as illustrated Table 2 below:

Table 2: Summary of Avi One Products.

| Avi One | | |
|------------------|-----------|----------------|
| Cages | Toys | Hammocks/Seats |
| Feeders/Drinkers | Perches | Bird Nets |
| Cage Fronts | Coop Cups | |

Pet One

The Pet One product range represents the largest collection of Kong's "One" brands, catering for cats, dogs, mice, rabbits and guinea pigs. Table 3 shows the extent of this product range.

Table 3: Summary of Pet One Products.

| Pet One | | |
|---------------------------------------|-----------------------------|-------------------------------------|
| Kennels | Dog Beds | Cat Beds |
| Pet Carriers/ Crates/Pens/Training | Waste Bags | Poo Scooper |
| Training Pads/Trays | Dog Collars/Leads/Harnesses | Grooming |
| Dog Coats | Drinkers/Feeders/Bowls | Dog Treat Rawhide |
| Dental Aid | Dog Toys | Cat Toys |
| Cat Collars/Leads/Harnesses | Litter Trays | Cattery Cages |
| Scratching Posts | Pet Doors | Mouse/Rat/Ferret/Chicken Housing |
| Small Animal Accessories | Small Animal Toys | |

Pond One

Pond One products include filters, fountains and pumps for water gardening. Table 4 lists the products available under this label.

Table 4: Summary of Pond One Products

| Pond One | | |
|---------------|-------------------------|------------------|
| Pumps | Air Blowers | Filters |
| Pond Lighting | Ultra Violet Clarifiers | Extension Cables |
| Pond Food | Water Treatments/Blocks | |

Reptile One

Reptile One products are designed for the care of reptiles, amphibians and invertebrates including snakes, lizards, frogs, spiders, scorpions and turtles. (See Table 5 for Product Range).

Table 5: Summary of Reptile One Products

| Reptile One | | |
|------------------------|----------------------------------|---|
| Housing | Heat Mats | Rocks |
| Fan Heater | Fan Heater Replacement Globes | Heat Cords |
| Water Heaters | Thermostat | Heat Lamps |
| Halogen Heat Lamps | Mercury Vapour Heat Lamps | Heat lamps reflectors/Sockets/T8 Reflectors |
| Filtration | Lighting | Cleaning & Maintenance |
| Hooks | Locks | Water Treatments |
| Thermometer/Hygrometer | Calcium/Vitamin/Sludge | Turtle Blocks |

| | | |
|--------------------------|-----------------------|-----------------------|
| | Remover/Cleaners | |
| Turtle Food | Turtle Floats | Cricket Box |
| Hermit Crab Food/Salt | Hermit Crab Shells | Hermit Crab Ornaments |
| Substrates/Sands/Bedding | Bowls/Dishes | Hide Caves/Ledges |
| Backgrounds | Decorations/Ornaments | |

The Product Development & Marketing team collaborates with industry specialists and its regional offices around the world to gather new product ideas and develop new concepts to bring highly innovative products to market. Currently, there are projects underway which are aimed at making electrical products more energy efficient and environmentally friendly. With close collaboration between designers, scientists, consultants and engineers, Kong's has invested significantly in the area of product development and innovation.

5. THE PLACE OF THE ORGANISATION IN THE SUPPLY CHAIN:

Kong's (Aust.) Pty Ltd are a brand owner and have addressed those key performance indicators of the Australian Packaging Covenant that are targeted at "brand owners," namely, 1,3,4,7 & 8. Our response to addressing these KPIs is provided in Section 9 "Action Plan," below.

6. PACKAGING MATERIALS AND FORMATS USED BY THE ORGANISATION:

Kong's Aust Pty Limited utilises the following packaging materials for its branded products in the Australian Marketplace:

- Cardboard
- Polystyrene for the "Aqua One, Reptile One, Pond One and Aquamanta brands"
- Polybags
- Bubble wrap
- Paper instruction booklets
- Twist ties for Reptile One and Aqua One Accessories
- Packaging Straps
- Shrink wrap
- Flexible foam wrap for Reptile One and Aqua One products
- Moulded hard plastic trays for aquarium CO2 products and test kits

Distribution packaging utilised includes:

- Shrink-wrap
- Sticky tape
- Strapping
- Paper
- Cartons
- Pallets

7. THE PERIOD COVERED BY THE PLAN:

The following Action Plan has been developed to be implemented over the three year period of July 2015- June 2018.

8. CONTACT DETAILS FOR THE PERSON RESPONSIBLE FOR IMPLEMENTING THE PLAN:

Tom Cellucci – Chief Administration Officer
Kong's (Aust.) Pty Limited
97 Williamson Rd, Ingleburn NSW Australia 2565
02 8796 5188
Tom_cellucci@kongs.com.au

9. ACTION PLAN

Kong's (Aust.) Pty Limited has established a Packaging Covenant Committee that comprises:

- The Chief Administration Officer
- The Chief Product Manager and;
- The National Account Manager.

This Committee is responsible for the adoption and implementation of the following action plan. The Committee will meet quarterly and minute meetings to ensure ongoing progress.

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|---|--|-----------------------|--|---|--|
| <i>1. Design - optimise packaging to achieve resource efficiency and reduce environmental impact</i> | | | | | |
| KPI 1 – Proportion of signatories in the supply chain implementing the SPG for design or procurement of packaging. Target: 70% of Covenant signatories with documented policies and procedures for evaluating and procuring packaging using the SPG or | <i>Indicate how the Sustainable Packaging Guidelines will be used for the review of existing packaging, including a timetable for reviewing existing packaging.</i> <ul style="list-style-type: none"> • The first step in implementing the Sustainable Packaging Guidelines is to educate relevant personnel involved in packaging design and procurement, on the content of the Guidelines. The following key personnel will be briefed on the requirements of the SPG via an interactive workshop to be held at Kong's Ingleburn Office within the first 6 months of this action plan implementation: • Chief Product Manager • Product Development Officer • Production Coordinator • QC Officer. • CEO | Chief Product Manager | Kong's is a new signatory to the Australian Packaging Covenant. Much of the first twelve months of activity will involve the collection of data, identification and quantification of packaging materials. | <ul style="list-style-type: none"> • Education of key personnel and raised awareness of compliance requirements and the Sustainable Packaging Guidelines by holding workshop. • An easy guide for personnel | <ul style="list-style-type: none"> • Within 6 months of acceptance of this action plan. • Within one month of the completion of this workshop. |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|---|--|---|---------------|---|---|
| <p>equivalent</p> <p>Target: 70% of Covenant signatories assessing 100% of new packaging and 50% of existing packaging against the guidelines</p> | <ul style="list-style-type: none"> • Within one month of the completion of this workshop, design and procurement personnel will be provided with a summary or “Ready Reckoner” of steps to consider when selecting or altering packaging configuration, to ensure adherence to the SPGs. • In order to ensure Kong’s Marketing personnel adopt and incorporate the Sustainable Packaging Guidelines (SPGs) into Kong’s packaging design and procurement practices, the following marketing representatives will be required to complete the Sustainable Packaging Covenant Toolkit, within the first twelve months of this action plan. • Damian Toth – Chief Product Manager <p>The toolkit is provided by the Australian Packaging Covenant and is located at: http://www.packagingcovenant.org.au/toolkit/</p> | <p>Chief Product Manager</p> <p>Chief Product Manager</p> | | <p>to consult to ensure design and procurement activities consider principles of the SPGs completed.</p> <ul style="list-style-type: none"> • Education of key personnel through completion of the Toolkit | <ul style="list-style-type: none"> • Within the first twelve months of this action plan. |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|----------------------------|--|-----------------------|--|--|---|
| | <ul style="list-style-type: none"> Given the large number of existing products retailed under Kong's "One" Brand, a review of existing packaging against SPGs will take considerable time. Initially Kong's will identify the major products within each brand group that comprise similar packaging configuration. These products will then be reviewed against the SPG and possible environmental improvements identified. For the products identified for initial review, packaging components will be weighed and cross checked with sales figures to establish baseline data. | Chief Product Manager | <p>The most common packaging materials used are;</p> <ul style="list-style-type: none"> Cardboard Polystyrene Polybags Bubble wrap Paper instruction booklets Twist ties Packaging Straps Shrink wrap Flexible foam wrap and; Moulded hard plastic trays | <p>Identification of products from each product group with similar packaging configuration and review against SPG, of selected items as examples. Packaging components will be documented and weighed and analysed against sales data to report on tonnages entering the market place along with possible improvement measures or removal of packaging components.</p> | <p>Within the first three months of action plan implementation</p> <ul style="list-style-type: none"> Materials identified will then be reviewed over the following two years. |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|----------------------------|---|-----------------------|---------------------------------------|---|--|
| | <ul style="list-style-type: none"> Kong's commits to completing the materials review process for at least one third of its packaging materials in the first twelve months of action plan implementation. As a part of the review Kong's will also collect and quantify packaging material volumes for these products by weighing packaging component materials and cross referencing with Australian sales data. This will provide a baseline for future reporting. <p>Additional packaging materials for not included in this initial review will be timetabled in the next twelve months for SPG review over the following two years (i.e. the remainder of this action plan's timeframe.)</p> | Chief Product Manager | | <ul style="list-style-type: none"> Completion of packaging materials review against SPGs. Quantification of packaging material volumes for significant product lines and establishment of baseline data. Formal adoption of outcomes from materials review process via a reporting template, and incorporation into design and procurement activities. | <ul style="list-style-type: none"> Within first twelve months the following packaging materials will be reviewed: <ul style="list-style-type: none"> Cardboard Paper instruction booklets Polystyrene Twist ties |
| | <ul style="list-style-type: none"> In addition to the activities committed above, Kong's will conduct a review of the | Tom Cellucci | Secondary packaging materials used in | <ul style="list-style-type: none"> Review completed to | <ul style="list-style-type: none"> Within first twelve months |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|----------------------------|--|----------------|---|--|---|
| | <p>secondary packaging materials and practises in place throughout its distribution network in order to understand and document warehousing activities in relation to packaging materials and associated waste generation.</p> <p>Distribution packaging utilised includes:</p> <ul style="list-style-type: none"> ○ Shrink-wrap ○ Sticky tape ○ Strapping ○ Paper ○ Cartons ○ Pallets | | <p>warehousing and distribution activities will be identified and quantities used annually estimated from procurement records, to establish a baseline.</p> | <p>provide an understanding of the practises and materials in place and identification of improvement opportunities.</p> | |
| | <ul style="list-style-type: none"> • Kong's will adopt a process that ensures the outcomes of the packaging materials review against the SPGs is formally incorporated into the development of new packaging. To facilitate this Kong's will develop a reporting template for adoption at the first packaging materials review that records potential improvements or alterations. This template will be used to inform the preparation of the Australian Packaging Covenant's Annual Report but will also be formally communicated to the design and procurement team for information and recommendations on new product packaging design or configuration. • Secondly Kong's will introduce an internal process that documents that the contents | | | <ul style="list-style-type: none"> • Formal documentation of packaging materials review and consideration as part of future design and procurement activities | <ul style="list-style-type: none"> • As part of annual reporting processing. |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|----------------------------|--|-----------------------|---------------|---|---|
| | of the SPGs have been considered as a part of the design and procurement of all packaging materials for new products released into the Australian market. | | | | |
| | <p>Each year, Kong's will identify in its annual report those new products released into the market for the preceding 12 months and document the design and procurement considerations of associated packaging material against the SPGs.</p> <ul style="list-style-type: none"> Also as a part of its annual reporting process, Kong's will assess and document changes to packaging configurations and where possible quantify the impacts of these changes in terms of volumes of material excluded from the marketplace and/or distribution activities. | Chief Product Manager | | <ul style="list-style-type: none"> Identification and documentation of changes to packaging configurations and quantification of volumes of materials diverted from the marketplace. | <ul style="list-style-type: none"> As part of annual reporting processing. |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|--|--|-----------------------------------|--|--|---|
| <i>2. Recycling - the efficient collection and recycling of packaging</i> | | | | | |
| KPI 3 – Proportion of signatories with on-site recovery systems for recycling used packaging | <p>In order to optimise the onsite recovery opportunities, Kong's will initially undertake the following actions with regarding to KPI 3:</p> <ul style="list-style-type: none"> Establish baseline data of waste and recyclables generated onsite including tonnages of cardboard currently diverted for recycling. Review the current metal recycling system | Tom Cellucci Andrew Millen | Kong's currently engages in onsite recycling of cardboard along with some other sporadic reuse practises in its warehouse. | An understanding of the reuse and recycling opportunities including identification of recyclable materials that require an | Kong's will establish baseline data during the first twelve months and include in its first annual report (2016.) |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|--|--|-----------------------------------|---|---|--|
| 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 | <p>to recover wire and copper from damaged birdcages and cables used in distribution packaging</p> <ul style="list-style-type: none"> Estimate the volume of cartons reused in the warehouse for product distribution Review internal office and distribution practices to identify waste streams and opportunities for reuse or recycling. <p>Following this review and establishment of baseline data, Kong's will then investigate the opportunities to expand its onsite recovery system for used packaging and other materials.</p> | | Kong's has anecdotal data on its current cardboard recycling and onsite warehousing practices of carton reuse. These practices will be quantified as part of the first year's activities. | improved onsite recovery system. | As identified additional recycling systems/improved practices will be implemented in the second 12 month period (2016/17.) |
| | <p>Kong's are committed to the establishment and implementation of a formal policy for the purchase of goods containing recycled content wherever it is appropriate to do so. Kong's will draft and implement a "Sustainable Purchasing Policy," through consultation with key purchasing personnel. The policy will be worded so as to be practical and user friendly whilst still encouraging sustainable purchasing practices. The policy will be drafted and relevant staff consulted and informed during the first twelve months of Action Plan implementation.</p> <p>Following the adoption of this policy Kong's will implement a monitoring system to record the number of transactions and quantity of units purchased that contain recycled material versus its virgin alternative. This system will be developed and implemented during the second year of this action</p> | Tom Cellucci and Jeffrey Lam CFO. | None. Purchases made under the new policy to be recorded during second year. | <ul style="list-style-type: none"> The implementation of a formal policy and communication to staff and suppliers will ensure purchasing decisions carefully consider the incorporation of recycled content in goods where possible. Quantification | <ul style="list-style-type: none"> Year 1 (2016.) Year 2 (2017.) |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|----------------------------|---|----------------|---------------|---|--|
| | <p>plan.</p> <p>In the third year, Kong's will begin to report on quantities of goods purchased under the policy and quantify the environmental savings achieved.</p> | | | <p>of environmental savings achieved through adoption of this policy.</p> | <ul style="list-style-type: none"> Year 3 (2018.) |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|---|---|--|--|---|---|
| <i>3. Product Stewardship - demonstrated commitment to product stewardship</i> | | | | | |
| <p>KPI 6 – Proportion of signatories that have formal processes for working with others to improve design and recycling of packaging</p> <p>Target: 70% of Covenant signatories implementing formal policies and procedures in working with others to improve design, procurement and recovery of packaging</p> | <p>Include ways of developing formal processes to work with your supply chain to improve packaging design and recycling.</p> <p>To address the requirements of this goal and KPI, Kong's intends to conduct a review of its suppliers over the three years of the action plan's life. This review will include:</p> <ul style="list-style-type: none"> Drafting and distributing a letter to major suppliers to advise them of our commitment to and requirements of the Australian Packaging Covenant. Kong's will also distribute a questionnaire to its suppliers to ascertain alternative sustainable packaging options. Where new packaging suppliers are required, the procurement process will include obtaining relevant sustainability data and consideration of environmentally friendly packaging options. A checklist based on the | <p>Purchasing Department – Crystal Lee – Chief Purchasing Officer.</p> | <p>Kong's has some background information regarding its suppliers. This will be updated and expanded to establish a database of product stewardship initiatives occurring amongst key suppliers.</p> | <p>Establishment of a database of suppliers that lists environmental credentials of key suppliers and potential packaging alternatives based on feedback from questionnaire. Identification of fellow signatories for Australian Based suppliers.</p> | <p>Key suppliers will be notified on a rolling basis in line with materials ordering. In the first year, Kong's will draft the advisory letter and distribute to suppliers.</p> |

| | | | | | |
|--|--|--|--|--|--|
| | <p>Sustainable Purchasing Policy will aid this process.</p> <ul style="list-style-type: none"> • Where suppliers are Australian based, they will be requested to advise their status as a signatory to the Covenant. • Where suppliers are internationally based, Kong's will request a summary of their product stewardship and environmental credentials. • Suppliers will also be notified of Kong's adoption of a "Sustainable purchasing policy," (as developed against KPI 4) once it is implemented. | | | | |
| | • | | | | |

| Performance goals and KPIs | Actions | Responsibility | Baseline data | Targets | Milestones |
|--|---|-------------------------------|--|--|--|
| <i>3. Product Stewardship - demonstrated commitment to product stewardship</i> | | | | | |
| KPI 7 – Proportion of signatories demonstrating other product stewardship outcomes | <ul style="list-style-type: none"> • To address this KPI Kong's will review its onsite resource consumption in terms of water and energy and examine current practices to identify resource saving opportunities | Chief Administration Officer. | Following 12 months' worth of data relating to water and energy consumption. Current and proposed water and energy saving practices. | To implement sustainability measures that achieve a measurable reduction of 2% water and energy. | The implementation of a change in current practices that achieve a reduction in water and energy consumption |
| KPI 8 – Reduction in the number of packaging items in litter | Reduce litter. Reduce your products' packaging in the litter stream, Reducing litter on your site, or reducing litter in the local community. | | Kong's products are distributed through major retail outlets and intended for | Kong's will report annually the percentage of products in each category | Review of labelling to be completed over the three year period. In year 1, |

| | | | | | |
|--|--|---|---|--|---|
| | <p>To address this KPI, Kong's will conduct a review of its labelling on product packaging to ensure consumers are encouraged to dispose of their packaging appropriately. This review will be undertaken in conjunction with the activities outlined above to address KPI 7 and encourage recycling where possible of packaging materials.</p> <p>A part of this labelling review will include the addition of an appropriate litter disposal message on Kong's "Doggy Waste Bags," of which almost 1 million units are sold into the Australian marketplace annually.</p> <p>Kongs will also facilitate its employees to participate in Clean Up Australia Day activities.</p> | <p>Damian Toth</p> <p>Andrew Millen</p> | <p>domestic use. The nature of our products implies that associated packaging materials are highly unlikely to end up in the litter stream.</p> | <p>that have correct labelling. Kong's will also report on the number of Doggy Waste Bags that are labelled with appropriate litter disposal instructions and sold into the Australian marketplace.</p> <p>Kong's will report on the number of staff who participate in Clean Up Australia Day activities and report on achievements made.</p> | <p>those products identified in KPI 1 to have the most significant environmental impact with regard to packaging material in each brand category will also be reviewed for labelling design and consumer information.</p> |
| | <p>Kong's will also review its current product labelling and where possible and appropriate investigate the opportunities including messages to encourage recycling. This review will occur in line with the packaging materials review as outline in KPI 1.</p> | <p>Damian Toth</p> | <p>Inventory of labelling to ensure recyclability message is included wherever</p> | | <p>Labelling review will occur in conjunction with SPG materials review as outlined in KPI 1.</p> |

| | | | | | |
|--|--|--|-----------|--|--|
| | | | possible. | | |
|--|--|--|-----------|--|--|

10. FORMAL COMMITMENT BY THE CHIEF EXECUTIVE OFFICER OR EQUIVALENT, TO IMPLEMENT THE ACTION PLAN.

Kong's (Aust.) Pty Limited's Chief Executive Officer, Davy Kong is committed to adopting and implementing the requirements of the Australian Packaging Covenant including the actions set out in this plan. Kong's looks forward to working with the Australian Packaging Covenant to implement these important activities and inform stakeholders of its progress through the annual reporting process.