EDWARD BULMER NATURAL PAINT

Green Claims Policy

Introduction

As signatories of The Anti-Greenwash Charter, we are committed to upholding good standards of responsible marketing and communications practice. The purpose of this policy is to define the standards we adopt throughout our organisation to ensure green claims made about our products are fair and substantiated.

This policy applies to all the forms of marketing and communications we use:

- Print media advertising and editorial (including online offshoots)
- Website and online marketing (including social media and influencer marketing)
- Direct marketing
- Print marketing
- Packaging
- Events, trade shows, stockist and other professional promotions and communications

All marketing and communications always comply with the relevant local laws and regulations.

In addition to this policy, we participate in Campaign Reviews commissioned by The Anti-Greenwash Charter to ensure our marketing and communications align with the standards outlined in this policy.

Our Standards

We commit to the standards of communication set out in The Anti-Greenwash Charter, which are as follows:

Transparency

We commit to clear communication of what sustainable benefit our product or service offers and won't conceal or omit information.

Accountability

We substantiate our sustainability claims with accurate and regularly evaluated empirical evidence. We commit to sharing facts, figures and statements that can be checked.

Fairness

We commit to using fair, clear and unambiguous language when providing comparisons with other products or organisations.

Honesty

We will ensure we make specific statements about our organisation's sustainability efforts and that our actions match those promises.

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Our Practices

We implement the following practices and procedures to ensure we uphold the aforementioned standards:

- Clearly define the green terms we use
- Provide third-party verified evidence for the claims we make
- Set standards for authentic and accurate visual representation
- Outline a clear editorial process
- Detail the training we provide our employees
- Ensure responsible use of AI in content creation
- Introduce our escalation procedure
- Share our approach to customer education
- Explain how we support partners and collaborators
- Commit to regular reviews and effective governance
- Maintain strict legal compliance

Definitions

We define all the key 'green' terms we use to describe our products to ensure our claims are clear and transparent:

Natural:

Made from naturally occurring materials, including minerals in their raw or processed state. Our wall and ceiling paint is made from plant-based and mineral raw materials ingredients which are listed on the tin, **Technical Data Sheet**, and described here. Also used in our brand name.

Healthy:

Contributing to healthy interiors and air quality. Our paints are tested in accordance with the AgBB assessment scheme for good air quality and offer low-emission formulations.

Water-based:

Diluted with water, but without water being the majority ingredient.

Plastic free:

The resin binder, Replebin®, in our wall paints is not derived from fossil fuels.

Consciously created:

We consider people and the planet in our business practices and when creating our products. This is verified by our **B Corp status**.

Non-toxic:

Without ingredients that are classed as hazardous, toxic, carcinogenic or polluting.

Vegan:

Neither containing animal products nor having been tested on animals. None of our products are tested on animals and our vegan products are labelled accordingly. Full ingredient declarations can be found on product packaging and **Technical Data Sheets**.

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Bio-based Binder:
A unique bio-based binder developed exclusively for AURO, our manufacturer. Made from plant alcohol esters of pine and castor, with a small amount of fossil-derived monomers. It is constantly being developed to become fully biogenic. Used in our water-based eggshell and water-based gloss.

Replebin®:
A biogenic, plant-based binder based on a carbon feedstock derived from maize and wheat straw. Its biogenic content is regularly confirmed by **SGS INSTITUT FRESENIUS**.

Low VOC:
Less than 1 g/l, though not claimed to be VOC (Volatile Organic Compound) free, as ambient levels in the atmosphere are likely to be above zero. VOC levels in our paints can be found on our **Technical Data sheets**. Evidence of testing and verification from our manufacturers can be seen **here**.

Breathable:
High microporosity, verified by the Sd values which are stated on our **Technical Data Sheets**. Sd (Steam Diffusion) is a German method for measuring breathability. For a paint to be breathable it should have a Sd value of 1 or lower – the lower the value the more breathable the paint. Our paints meet the **SPAB** guideline Sd values for use with historic buildings.

Toy & Child Safe:
Our products comply with the Toy Safety Standard EN 71-3 and the German Saliva and Perspiration Resistance Standard DIN 53160 where stated. Details of the test results can be found on our **Technical Data Sheets**.

Pigment:
Finely ground mineral pigment in water suspension.

If you come across a term you don't understand and can't find it on this list, please email Milla Elder, Head of Marketing: **milla@edwardbulmerpaint.co.uk** for clarification.

Verified Claims

Our commitment to establishing and verifying green, as well as product claims, via reputable third parties involve empirical testing and benchmarking against industry standards.

Approximately 10% of our manufacturer's workforce are in the labs developing, testing and monitoring the performance of paints, coatings and care products made in the factory.

Our products undergo standard **DIN testing** for performance criteria and are also assessed by a range of certification bodies.

We publish vital, but not mandatory, Sd values (product breathability) information on our website, as well as a complete ingredient list for our emulsion, water-based eggshell, water-based gloss at edwardbulmerpaint.co.uk, on the product tins and Technical Data Sheets.

All verified claims are reviewed annually to ensure continued alignment with updated standards and regulatory requirements. Any changes to certification status or compliance levels will be reflected in our marketing and disclosed on our website.

Use of Imagery & Colour

In our commitment to transparent and honest communication regarding our sustainability efforts, we recognise the powerful impact of visual representation in shaping perceptions. At the same time, we acknowledge the need for creatives to have the freedom to explore and innovate. Therefore, we uphold the following principles related to the use of imagery and colours in our marketing and communications materials, balanced with appropriate review mechanisms:

Authentic Imagery:

We commit to using genuine and representative images of our products and initiatives. We avoid the use of stock photos that may mislead or give an exaggerated impression of our green efforts.

Avoidance of Greenwashing through Colours:

The use of green or earth tones in materials can evoke feelings of environmental friendliness. We ensure that such colours are used responsibly and are not misleading. If a product is represented with green colours, with the exception of our green colour palette, it must have substantiated green credentials to back up such representation.

Highlighting Actual Efforts:

When showcasing our sustainability projects or achievements visually, we will only use images from actual initiatives we have undertaken, avoiding generic or unrelated imagery that may give a false sense of our environmental impact or efforts.

Transparency in Photo Alteration:

Any alterations or edits to photos that may change the reality or context of our green initiatives will be clearly disclosed. This includes photoshopped elements, exaggerated effects, or other changes that might give a misleading impression.

Cultural & Environmental Sensitivity:

We ensure that any imagery used respects the cultural, environmental, and socio-economic context of the regions or communities depicted. This includes avoiding imagery that may be perceived as appropriating or misrepresenting cultural or environmental elements.

Educative Infographics:

Where possible, we will use visual aids such as infographics to simplify and convey complex sustainability data or concepts. These visuals will always be based on substantiated facts and will be designed in a manner that is easy to understand without misrepresenting the information.

Creative Flexibility & Review Process:
While we encourage creativity and innovation in our visual content, our editorial process ensures that all materials are reviewed for accuracy and alignment with our sustainability values. Should any concerns arise, we have a system to highlight issues promptly and make appropriate amendments to maintain integrity in our visual communications.

All visual content is reviewed by the marketing team to ensure it aligns with these principles. Significant alterations, such as colour correction, will always be disclosed where appropriate. For any concerns or questions regarding the imagery and colours used in our materials, or if you believe we are not adhering to the standards set out in this section, please contact **milla@edwardbulmer.co.uk**. We appreciate feedback and are dedicated to continuous improvement in our visual communications.

Editorial Processes

We ensure that a member of the marketing team and Senior Management review every piece of content and any green claims before publication and distribution.

Our content is constantly evaluated. When writing content, our team refers to our list of clearly defined terms and updates the list when using a new term or claim.

We encourage all staff members to challenge our green claims before and after publication.

Staff training

All marketing and customer facing staff receive an in-house training session on our Green Claims Policy and The Anti-Greenwash Charter with the Head of Marketing, so they fully understand the issues and benefits.

New employees are issued a copy of the Green Claims Policy within the Employee Handbook, so all staff members can refer to it as needed.

Each year, all employees attend a refresher training session to discuss changes to the policy. We conduct an annual assessment of our Green Claims training program, incorporating employee feedback to ensure relevance and effectiveness. Updates are made to align with regulatory changes and industry best practice.

The policy is made available to any advertising or marketing agency we employ.

Use of AI

We utilise AI tools to assist in the creation of content, particularly for data analysis, report generation, and content personalisation. To maintain the integrity of our green claims, all AI-generated content is rigorously reviewed by our human editors before publication.

Our editorial team ensures that the content aligns with our sustainability values, verifies the accuracy of any green claims, and cross-checks the use of key terms against our defined list. We also provide transparency by disclosing the use of AI where it has significantly contributed to the creation of content.

Additionally, we conduct regular audits to assess the impact and accuracy of AI-generated content, ensuring continuous alignment with The Anti-Greenwash Charter's standards.

Stakeholder Engagement

We operate in a market that is characterised by greenwashing, as is evidenced by the use of 'eco-friendly' for water-based products that are produced with fossil-fuel based materials in polluting and energy intensive processes.

We know many of our customers are subject to this greenwashing and we do our best to enlighten them, which is why we commit to answering any emails about our green claims within three working days. It is also why we take the opportunity presented by editorial requests (usually about decor), to emphasise the issues behind the choice of paints, particularly for customers striving to reduce their carbon impact. We regularly engage with customers to discuss green claims made by other paint companies in our market to ensure that they are clearly understood. Our resources for external stakeholders include our industry report, Lifting the Lid, hosted on our website **here**. Our founder, Edward, regularly takes part in both invited and ticketed industry presentations and knowledge-sharing engagements.

If you have any questions or feedback on this policy or our own green claims, please email **milla@edwardbulmerpaint.co.uk**. Alternatively submit any greenwashing concerns directly to The Anti-Greenwash Charter for independent review **here**.

Partnerships & Collaborations

We are dedicated to promoting sustainability and responsible marketing and communications practice across our network of partners and collaborators.

We actively engage with our partners to encourage alignment with our sustainability values and the principles outlined in this policy. This engagement involves referring to The Anti-Greenwash Charter, whilst also sharing knowledge and resources to enhance their understanding and implementation of responsible marketing and communications practice.

We uphold transparency in all our partnerships. Clear communication about the sustainability efforts of our collaborators is essential. We inform our stakeholders about the sustainability credentials of our partners, reinforcing our commitment to upholding our sustainability goals and public commitments, and encouraging a broader adoption of responsible business practices.

Regular Reviews

We carry out regular internal audits of our content and check all our references are up to date. During this audit, we also check for new developments in the industry that we can benchmark against. There are a growing number of companies adopting and publishing sustainability statements, which is welcomed and matched by our own published information.

Being a signatory of The Anti-Greenwash Charter is a continuous process; as such, we review our marketing and communications practice annually to ensure we are still compliant with any changes to the Charter.

Legal Compliance

Our commitment to legal compliance across our marketing and communications is unwavering. Our compliance framework includes regular internal audits, ongoing employee training, and collaboration with external legal consultants when necessary.

Our marketing and communications content is thoroughly reviewed to ensure it complies with all relevant local and international laws, including those related to environmental advertising and data privacy. We also stay informed about regulatory changes and update our practices accordingly to ensure continuous compliance. Any instances of non-compliance are promptly addressed, and corrective actions are taken to prevent future occurrences.

Governance of this Policy

The senior management team are responsible for establishing and following practices and operating models in line with the Green Claims Policy. Our Head of Marketing is responsible for ensuring that our compliance with this Green Claims Policy is regularly reviewed.

Any non-compliance with this policy will follow the following procedure:

1. Concerns to be reviewed by Head of Marketing.
2. If unresolved, Head of Marketing will escalate to CEO for guidance and corrective action, if required.
3. Any unresolved concerns will be reported to the board.
4. If the issue remains, independent review by The Anti-Greenwash Charter will be sought.

The Marketing Team reviews and updates all our marketing policy guidelines, which is reported to board members.

Before entering new partnerships with third parties, we share our Green Claims Policy with them to encourage adoption of similar standards.

Campaign Reviews

As a committed signatory of The Anti-Greenwash Charter, we actively engage in an audit process to ensure compliance with our Green Claims Policy. This process includes providing evidence of effective implementation of our practices and procedures during periodic reviews, conducted by The Anti-Greenwash Charter, of a marketing or communications campaign focusing on our green credentials.

These periodic assessments are vital in demonstrating our dedication to upholding responsible marketing and communications practice.

Moreover, we recognise and accept that all audit reports will be appended to our Green Claims Practice (GCP) for public review, ensuring an added layer of transparency and accountability. We are fully aware that any instances of non-compliance may result in the revocation of our certified signatory status, underscoring the importance of continuous compliance and transparency in our operations.

Where We Could Improve

What we claim we do should be measurable. We are committed to continuous improvement in our sustainability practices. We use a triple bottom line methodology to assess our conventional profitability and our social and environmental impact. Each year, we conduct a carbon audit to assess our operations and identify areas where we can mitigate our environmental impact.

As a certified B Corporation, we undergo a recertification process every three years, which assesses and verifies our social and environmental performance, transparency and accountability.

We consider all findings from both processes and proactively address areas for improvement.