

<b>Contact officer:</b> Name: Lotte Mastwijk Function: Manager Sustainability & Communications	<b>Human Rights Policy</b>  <b>GRI 408:</b> 103-2, 103-2, 103-3 <b>GRI 409:</b> 103-2, 103-2, 103-3 <b>GRI 412:</b> 103-2, 103-2, 103-3	<b>Issue date:</b> July 2017  <b>Last review date:</b> 11 January 2021 (V4.0)  <b>Next review date:</b> 11 January 2023
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## Introduction

LC Packaging International B.V. (LC Packaging) believes that everyone must be treated with dignity and respect and provided with basic human rights. This is of the utmost importance to LC Packaging as we have operations in locations that are risk countries where degradation of human rights is prevalent. We aspire to be a leader in social accountability by promoting a positive culture with respect to human rights. We support and respect the protection of international human rights within the sphere of our influence and ensure that we are not complicit in human rights abuses. As a family company, we consider all our employees a member of the LC family, and we treat them as such.

## Purpose

The purpose of this policy is to ensure that we are not involved in any practices that are harmful for human rights, and to avoid situations in which we cannot grant basic human rights. In addition, it is to inform all employees of the measures LC Packaging takes in order to ensure sufficient labour conditions specifically regarding labour relations (social dialogue), child and forced labour, and human rights. Informing employees of the measures we take also provides them insights into the rights they have as employees with regard to labour practices.

## Scope

The contents of this policy are intended for all employees, part time workers, interns, contractors of LC Packaging International B.V, its affiliates and production sites.

## Policy objectives

LC Packaging's approach to human rights and labour practices is based on the "UN Guiding Principles on Business and Human Rights" and internationally accepted standards, such as the International Labour Organization (ILO), SA8000 and OHSAS 18001, depending on location of operation.

As a proud advanced member of the [UN Global Compact](#), we strongly support, respect, promote, and protect internationally proclaimed human rights, such as the Universal Declaration of Human Rights and do our utmost to provide safe, healthy, and satisfying working conditions for all our employees around the world. We eliminate all forms of forced and compulsory labour, child labour and discrimination and expect our production partners to do the same. Moreover, we uphold the freedom of association and the effective recognition of the right to collective bargaining. With our stance on issues of human rights such as child labour, forced labour, and freedom of association and right to collective bargaining, we have come up with the below objectives.

### General

LC Packaging:

- complies with national laws and legislation of the countries in which we operate;
- complies with ILO conventions:
  - 29 regarding forced labour;
  - 105 regarding abolition of forced labour;
  - 87 regarding freedom of association;
  - 98 regarding right to organise and collective bargaining;
  - 182 regarding worst forms of child labour.
- complies with the SA8000:2014:
  - National Child Labour Elimination Policy 2010.
- complies with the:
  - Universal Declaration of Human Rights;
  - UN Convention on the Rights of the Child;
  - UN Guiding Principles on Business and Human Rights.
- ensures employees are not exploited;
- ensures employees are treated with dignity and respect;
- ensures employees are provided with sufficient working conditions;
- ensures employees are aware of the rights they have regarding labour practices;

- ensures not to have any unfair labour practices taking place within its business operations;
- communicates to employees the measures we take, and unacceptable practices;
- has 100% by LC Packaging locations and supplier operations covered by a human rights risk assessment performed by LC Packaging;
- has 100% of our employees in developing countries covered by formally-elected employee representatives (e.g. Works Council) or Unions;
- By 2022, has 100% of operational sites been subject to human rights reviews or human rights impact assessments (as part of on-site audits).

#### Freedom of association and right to collective bargaining

##### LC Packaging:

- ensures that all employees have the right to collective bargaining and freedom of association;
- informs the workers about their right to collectively bargain, explaining that the membership to trade union does not entail any negative consequences for workers;
- ensures that all employees are heard and can voice concerns related to the terms of their employment;
- ensures no retaliation for any such activities.

#### Child and forced labour

##### LC Packaging:

- does not hire children under the legal age according to the national law in the area of operation. LC Packaging does not hire children under the age of 14 or the minimum working age according to convention 138 of the ILO;
- eliminates all forms of forced and compulsory labour, child labour, and discrimination and expect our production Partners to do the same;
- spreads awareness to employees regarding child labour and forced labour;
- provides employees with a clear method through which unethical practices such as child or forced labour can be reported;
- documents agreements to principles of remediation even if there is no known child labour employed.

### Gender equality

LC Packaging:

- is a member of UN Women Empowerment Principles (WEPs) and has published a [CEO Statement of Support](#).

## Policy measures

LC Packaging strives to achieve the objectives with the following measures:

### Freedom of association and collective bargaining

LC Packaging:

- respects the right of all employees to form, join, and organise trade unions of their choice and to bargain collectively on behalf of their organisation;
- informs personnel that they are free to join a worker organisation of their choosing without any negative consequences or retaliation;
- does not interfere with the establishment, functioning, or administration of workers' organisations or collective bargaining;
- communication to workers within operations of LC Packaging, such as in Dutch-Bangla Pack Ltd., is undertaken by a "Worker representative". This is a worker who is chosen to facilitate communication with senior management on matters related to SA8000, elected by non-management personnel for that purpose;
- allows workers to freely elect their own representatives;
- ensures that representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation, or retaliation for being union members, representatives of workers or engaged in organising workers;
- production sites, such as LC Shankar have agreements with trade unions regarding wages and other conditions of employment;
- production sites, such as LC Shankar have regular meetings with a union and industrial relations consultants (IR consultant);
- includes clauses of collective agreements within its employment contracts in its locations, such as LC Packaging UK.

### Forced labour

#### LC Packaging:

- does not engage in or support the use of forced or compulsory labour;
- does not require employees to provide “deposits” or lodge identification papers with us prior to the beginning of employment;
- does not require workers to pay “deposits” or transfer their identification papers. These can be documents such as passports, birth certificates, religious records of age, travel documents, or any other documents that may have legal impact on worker’s legal status, freedom to travel, leave the job, etc.
- does not withhold any part of any personnel’s salary, benefits, property, or documents in order to force personnel to continue working for LC Packaging;
- does not take or threaten to take any negative actions on worker’s wage, benefit, property to ensure that they continue working for LC Packaging;
- does not charge recruitment or employment fees or costs directly or indirectly to workers;
- employees have the right to leave the workplace premises after completing a standard workday;
- employees are free to terminate their employment contracts provided they give reasonable notice;
- ensures that any overtime work is fully voluntary;
- does not provide barriers to restrict/ prevent the free movement of worker’s inside the premises;
- does not engage in or support trafficking in human beings;
- takes active steps to ensure that they have no association with any labour supplier or subcontractors using labour suppliers who may be trafficking workers;
- has created an awareness training for employees that touches upon the topic of forced labour.

### Child labour

#### LC Packaging:

- does not engage in any child labour;
- does not recruit under the age of 18; although, employees between 15-18 years can be accommodated if required in production sites such as Dutch-Bangla Pack Ltd, as employed for guided paid internships, or in office locations as guided paid internships;
- checks legitimate identification for the verification of age before recruiting potential new employees. These forms of identification include:
  - Personal Public Service number;
  - Passport;
  - Government ID;
  - National identity card;
  - Birth certificate;
  - School certificate;
  - Medical certificate from registered doctor.
- keeps a record of all employee ages in each employee's "employee file";
- discovers any child labour going on within our business operations, we will provide the subjected child programmes which provide for the transition to enable that child to attend and remain in quality education until he/she is no longer a child;
- has created an awareness training for employees that touches upon the topic of child labour.

### Gender equality

#### LC Packaging:

- has conducted the WEPs Gender Gap Analysis as a basis to further eliminate gender inequality from its operations and supply chain;
- addresses gender in its CSR activities and community projects (LC Supports Foundation);
- provides financial support to local NGOs that are working to empower women and girls (e.g. Waste Pickers Project in Bangladesh);
- Reports publicly on gender related topics.

## Human rights

LC Packaging:

- is an advanced member of the UN Global Compact and hence promotes, uses and [reports](#) on internationally proclaimed human rights standards;
- has been SA8000 certified in our production site Dutch-Bangla Pack Ltd.;
- promotes the importance of human rights in cooperation with organisations such as Social Accountability International (SAI) and the UN Global Compact, e.g. by organising webinars related to this topic;
- has joined the UN Global Compact [SDG Ambition Accelerator Programme](#) to further embed the Ten principles on Business and Human Rights and the Global Sustainable Development Goals into its business strategy and activities;
- via its [LC Supports Foundation](#) funds social initiatives such as providing youth training for a specific skill so that they are not forced into child labour where they do not work in safe conditions;
- provides employees with a whistleblowing procedure for them to report on any practices that violate human rights;
- provides employees with a grievance procedure for them to voice personal concerns regarding working conditions;
- has a supplier selection and assessment procedure in place aiming to eliminate human rights abuses in its supply chain.

## Approval of policy

**Name:** Lucas Lammers, CEO LC Packaging

**Date:** 11 January 2021

**Signature:**

A handwritten signature in blue ink, appearing to be 'L. Lammers', written over a light blue circular stamp.