

<p><b>Contact officer:</b> Amela Hamzic</p> <p><b>Function:</b> International Quality Manager</p>	<p><b>Materials, Chemicals, and Waste Policy</b></p> <p><b>GRI 306:</b> 103-1, 103-2, 103-3 <b>GRI:</b> Sustainable production</p>	<p><b>Issue date:</b> 4 September 2018</p> <p><b>Last review date:</b> 2 January 2023 (V5.0)</p> <p><b>Next review date:</b> 2 January 2025</p>
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## Introduction

### Purpose

Hazardous materials and chemical substances are greatly detrimental to the environment and human health. It is a health and safety issue in workplaces, and exposure to some substances and materials can cause adverse health effects including chronic diseases. **Royal LC Packaging International B.V.** (LC Packaging) is trying to minimise the usage of such materials and substances within its operations. Therefore, LC Packaging has created this policy to provide pertinent information to both employees and management regarding hazardous materials and chemicals, including processes and procedures the company has in place on dealing with hazardous materials and chemicals.

### 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 facilities Dutch-Bangla Pack Ltd. (DBPL) and LC Shankar (LCSH).

This policy is especially relevant for those working with the following products that contain hazardous materials:

- Pest control (pesticides)
- Printing (ink, bleach, cleaning agents)
- Gluing (glue)
- Cleaning (cleaning agents)
- Water treatment

## Policy objectives

LC Packaging identifies the following objectives for the handling and treatment of materials, chemicals, and waste:

- Minimise the negative impact on the environment and human health from the usage and disposal of hazardous materials and chemical substances.
- Comply with all relevant local legislation regarding the use and treatment of hazardous materials, chemicals, and waste.
- Ensure disposal of materials, chemicals, and hazardous materials appropriately and safely.
- Implement a waste management system in which disposal of hazardous materials is conducted without:
  - endangering human health;
  - harming the environment;
  - risk to water, air, soil, plants or animals;
  - causing a nuisance through noise or odours;
  - adversely affecting the countryside or places of special interest.
- Ensure a safe working environment when working with chemicals, and toxic waste.
- Provide employees with adequate knowledge to safely handle chemical and hazardous materials.
- Provide employees with adequate health and safety knowledge on what to do if affected by, or in contact with chemicals or hazardous materials.
- Ensure ink without hazardous substances is used for product packaging.
- Communicate the internal procedure to recall products when products with hazardous materials or chemical substances reach the end consumer.
- Reduce the usage of non-renewable resources within LC Packaging's operations.
- By 2022, have at least 80% of employees complete awareness trainings on the safe handling of chemical and hazardous materials.

## Policy measures

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

### Risk minimisation

LC Packaging's operations and site management must:

- create and maintain an inventory of all hazardous materials and chemical substances used or stored.
- conduct risk assessments of hazardous materials or chemical substances used on sites/ projects with regard to the following:
  - Hazardous properties
  - Safety data sheet provided by supplier
  - Exposure (type, and duration)
  - Preventive measures to be taken
  - Occupational exposure limit values or biological limit values
- conduct material safety tests to ensure no products contain excessive amounts of hazardous materials.
- conduct yearly health assessments of employees that are physically exposed to, and are closely working with hazardous materials or chemical substances.
- conduct yearly assessments of the status of equipment used to handle, store, or move hazardous materials.

### Labelling and packaging

LC Packaging's operations and site management must ensure that:

- hazardous materials and chemicals are labelled with appropriate warning signs and labels;
- packaging of products containing hazardous material are labelled with:
  - the name of the substance;
  - the origin of the substance (manufacturer, supplier, or importer);
  - danger symbol, and an indication of danger involved in the usage of this substance.
- areas or rooms which store hazardous materials are marked appropriately with a suitable warning sign or label.
- together with the sales teams, the local and international quality team provide consumers with appropriate warning of the hazardous materials in products and explain proper usage of the products.

## Disposal and transportation

LC Packaging's operations and site management must:

- implement procedures for safe disposal of hazardous materials.
- be transparent with all stakeholders, and inform them of the usage of hazardous materials, the disposal and recycling methods.
- create a log of all hazardous waste which has been disposed of with regard to the following:
  - Quantity
  - Type (nature of material)
  - Origin
  - If relevant, destination
  - Frequency of collection
  - Mode of transport
  - Treatment method
- monitor and annually report on recycled or disposed hazardous materials and chemicals.
- collect waste oils separately if possible.
- collect bio-waste separately.
- recycle bio-waste in order to create safe materials from this waste.
- ensure that transportation of hazardous materials and chemicals is executed by trained professionals or certified third parties.
- ensure that transportation of hazardous materials or waste is recorded.
- implement emergency procedures for leaking hazardous materials during transportation.

## General

- LC Packaging's operations and site management are responsible for implementing a waste management system for hazardous materials and chemicals which is in accordance with the waste hierarchy of EU Directive 2008/98EC. This means the following for our hazardous materials, if possible:
  - Prevention;
  - Preparing for re-use;
  - Recycling;
  - Other recovery, e.g. energy recovery;
  - Disposal.
- LC Packaging Netherlands must comply with voluntary regulations of printing inks for food packaging materials of the Japan Printing Ink Makers Association.
- LC Packaging's operations and site management must provide employees with a training on hazardous materials and chemicals and how to handle them safely.
- LC Packaging's production facilities must follow a 'Hazardous Chemical Substances Procedure' which contains information regarding:
  - handling, and storing of hazardous chemicals;
  - emergency responses regarding evacuation procedures and medical treatment and assistance.

- LC Packaging's operations and site management must provide appropriate equipment for the handling of hazardous materials and chemicals.
- LC Packaging's operations and site management must implement procedures for containment of any spillage of hazardous materials during storage or transportation on water and land.
- LC Packaging's International Quality team must implement an internal withdrawal or recall procedure for all products.

### Approval of policy

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

**Date:** 2 January 2023

**Signature:**

