

Contact officer: Pauline van der Heijden	Anti Greenwashing Policy	Issue date: 20 October 2022
Function: Communications Representative		GRI 417: 103-1, 103-2, 103-3, 417-1

Introduction

The purpose of **Royal LC Packaging International B.V. (LC Packaging)** is to contribute to a world without waste: the waste of valuable products during storage and transportation, and packaging waste. LC Packaging wants to work in such a way that it does not limit the next generation in the choices they want to make or the recourses they have available. By making it its mission to be a leader in sustainable packaging, LC Packaging believes it can make that impact and has written down its vision, ambition and three goals in its [2030 Ambition](#).

To increase the visibility of its initiatives and progress, LC Packaging communicates about its sustainability policies, actions, and progress online and offline with its stakeholders and wants to do so in the most honest, accurate, and clear manner.

Purpose

Companies must be honest about sustainability in their communications and use clear, correct, and relevant sustainability claims to avoid “greenwashing”. It is often difficult for consumers, companies, and other market actors to make sense of the many environmental claims, labels, and initiatives on the environmental performance of products and companies. This policy seeks to define and recognise greenwashing in its online and offline communications in order to prevent conveying a false impression or providing misleading information about the sustainability of LC Packaging’s products and value chain.

Scope

The contents of this policy are intended for all employees, interns, and contractors of LC Packaging International B.V., its affiliates, and production facilities Dutch-Bangla Pack Ltd. (DBPL) and LC Shankar (LCSH).

Policy objectives

LC Packaging wants to stay a leader in sustainability within the packaging industry. Being a leader also means having an example role in communicating about sustainability in an honest manner. LC Packaging identifies the following objectives to avoid greenwashing in its communications:

- Comply with European Union regulations regarding (misleading) advertising:
 - EU Directive 2006/114 EG concerning misleading advertising;
 - EU Directive 2006/114/EG concerning misleading advertising so as to include comparative advertising.
 - EU Directive 2023/0085 greenwashing directive.
- Make clear and nuanced claims on the exact sustainability advantage of LC Packaging products considering the environmental, social, and ethical impact of the product.
- Ensure LC Packaging products are only called 'sustainable packaging', when it meets all 8 sustainable packaging criteria as defined by the Sustainable Packaging Coalition (SPC).
- Be honest and specific about LC Packaging's efforts with regard to sustainability by distinguishing between general information about the company's sustainability efforts, and specific information about the benefits of an individual product.
- Ensure 100% transparency by complete reporting, e.g., avoid leaving out less favourable results.
- Ensure sustainability claims are substantiated with facts which can be verified and that are reviewed on a regular basis to ensure accuracy, e.g., back sustainability claims with information on the full lifecycle of the products.
- Ensure sustainability claims are fair and meaningful when compared to similar products and services from other companies.
- Ensure that when a sustainability claim is based on a self-developed sustainability programme, recipients are properly informed about the programme and its contents.
- Ensure the use of imagery that is proprietary to LC Packaging or supports the content of the claim, but which is not confusing or deceiving, e.g., clear symbols, pictograms or labels.
- Avoid the use of general wording (e.g., 'we are committed to') without following up with evidence.
- **0** claims of greenwashing or misleading advertising.
- **80%** of LC Packaging management, employees, interns, and contractors must be trained in greenwashing practices and how to avoid them before 2025.

Policy measures

LC Packaging strives to achieve its objectives with the below measures.

Knowledge-sharing

To ensure clear, accurate and transparent sustainability communications, knowledge-sharing is key. Therefore, LC Packaging is taking the following measures:

- LC Packaging's Marketing and Communications department **developed a mandatory online training course** about anti-greenwashing within the first 6 months after publishing this policy. The training course will teach LC Packaging management, employees, interns, and contractors about clearly, accurately, and transparently communicating about sustainability claims with stakeholders.
- LC Packaging management, employees, interns, and contractors must complete the online mandatory **Anti Greenwashing training course** before 2025, or within the first 3 months of employment.
- LC Packaging Marketing and Communications department, together with the Sustainability department, Supply Chain department, product management and other related departments must **accurately update** LC Packaging management, employees, interns, and contractors **on sustainability-related developments** in LC Packaging's value chain.

Sustainability Claims

LC Packaging aims to keep its sustainability claims honest, clear, and correct by following these measures:

- LC Packaging's Marketing and Communications department, together with the Sustainability department, and product management, must **annually review greenwashing claims and its evidence** to ensure accuracy. Specifically, claims relating to environmental and social properties, e.g., % PCR content, and working conditions.
- LC Packaging's Marketing and Communications department must **annually review and update all greenwashing-related communications** on LC Packaging's corporate online channels and (external and internal) presentation tools to ensure all claims and its evidence are up to date.
- LC Packaging's Marketing and Communications department, together with the Sustainability department, must supervise that **all greenwashing claims are written and explained in an easy-to-understand manner**, eliminating unnecessary jargon, to eliminate confusion or misunderstanding. Claims must be specific, verifiable, and understandable.

- When making sustainability claims, LC Packaging management, employees, interns, and contractors:
 - must phrase the sustainability claim or must **provide up-to-date and complete proof of claims** made on online platforms or during online or in-person presentations, e.g., calculations, reports, and lifecycle assessments;
 - must **clearly differentiate the sustainability benefits of the company** LC Packaging and the sustainability benefits of **the product** when communicating with stakeholders;
 - must **always tell the full story**, e.g., one cannot inform about important improvements with an environmental benefit, without mentioning, if there are any, the negative impact on human rights;
 - **cannot make a sustainability claim or benefit about a general feature** that the product normally already has or that it normally lacks, e.g., ‘LC Packaging cardboard boxes are not made of tropical hardwood’;
 - must ensure that any comparisons between LC Packaging and competitors, and LC Packaging’s products and other products are relevant, and justifiable with evidence. **Unsubstantiated comparisons and claims must be avoided.** Specifically, avoid terms such as ‘the greenest, the cleanest, etc.’;
 - must only speak of goals when there is a clear, concrete, and verifiable strategy for achieving those goals;
 - must refrain from the following phrases:
 - “This product is 100% sustainable”
 - “We offer sustainable packaging”
 - “Reuse is more sustainable than purchasing new packaging”
 - “100% recycled materials”
 - “This product is 30% less harmful to the environment”
 - “We are committed to leaving a better world for future generations to enjoy”
 - General terms such as “environmentally friendly”, “honest”, “green”, “fair”, “environmentally safe”, “organic”.
 - should instead use phrases such as:
 - “This product meets all 8 sustainable packaging criteria, and can therefore be considered sustainable”
 - “Reuse is more sustainable than buying new packaging, when...”
 - “This product is made out of 100% recycled materials”
 - “This product is 30% less harmful to the environment compared to...”
 - “We are committed to leaving a better world for future generations to enjoy and are going to do so by...”

Visual Claims

Visuals are known to transmit information faster than spoken or written words. To ensure visual claims do not interfere with written and spoken claims, LC Packaging is taking the following measures:

- LC Packaging's Marketing and Communications department must **provide an easy-to-use image library with appropriate imagery** to support LC Packaging management, employees, interns, and contractors in their sustainability communications. LC Packaging management, employees, interns, and contractors are required to use images stored in this image library.
- LC Packaging's Marketing and Communications department, together with the Sustainability department and Quality department is responsible for applying for and receiving the **necessary permissions to use sustainability-related imagery of external parties**, e.g., FSC®.
- LC Packaging's Marketing and Communications department, together with the Quality department and product management, must ensure that **any logo's used on labels and communication tools are (internationally) recognised and registered**.
- LC Packaging management, employees, interns, and contractors may **only use symbols, pictograms or labels if they are supporting the sustainability claim**, and not use them to make a presentation, leaflet, etc. look 'more sustainable'.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 11 January 2024

Signature:

