

**Contact officer:**

Amela Hamzic  
International Quality Manager

**Customer Health and  
Safety Policy**

**GRI 416:** 103-1, 103-2, 103-3

**Issue date:**

3 September 2018

**Last review date:**

06 February 2025 (V6.0)

**Next review date:**

06 February 2027

## Introduction

### Purpose

**Royal LC Packaging International B.V.** (LC Packaging) is committed to produce and distribute consistent and sustained high quality, safe and effective packaging solutions to ensure the safety of our customers and their customers. We ensure all our practices and the final delivery of our products comply with all the health and safety requirements wherever in the world we operate. This policy contains our commitment to ensure the safety of our customers remain in the forefront of our operations.

### 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).

## Policy objectives

LC Packaging complies with:

- Directive 2001/95/EC on general product safety;
- Directive 1907/2006/EC on the restriction of chemical use;
- Directive 2002/95/EC on the restriction of the use of hazardous substances;
- Directive EU 10/2011 on plastic materials and articles intended to come in contact with food;
- Regulation (EU) 2024/3190 on Bisphenol A (BPA) in Food Contact Materials: Adopted on 19 December 2024, this regulation bans the use of BPA and other bisphenols in certain food contact materials and articles to enhance consumer safety. The ban is effective from 1 January 2025;
- Regulation (EU) 2025/351 amends Regulations (EU) No 10/2011, 2022/1616, and 2023/2006, updating rules for plastic and recycled plastic materials in food contact. It clarifies migration limits, aligns definitions with REACH, strengthens compliance documentation, and repeals Regulation (EC) No 282/2008;
- Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR): This regulation, published on 22 January 2025, replaces the previous Packaging and Packaging Waste Directive 94/62/EC. It aims to make all packaging reusable or recyclable by 2030, promoting sustainability and reducing environmental impact. The regulation will apply from 12 August 2026;
- Directive EC 1935/2004 on the quality of packaging produced for food;
- Directive EC 2023/2006 on good manufacturing practices for materials and articles intended to come into contact with food;
- ISO 22000 on food safety management;
- ISO 9001 on quality management systems;
- ISO 21898 on flexible intermediate bulk containers (FIBCs) for non-dangerous good;
- ISO 13934-1 on tensile properties of fabrics;
- ISO 12048 on filled transport packages;
- SA 8000 on employee rights and well-being;
- Directive EC 2022/1616 on recycled plastic materials and articles intended to come into contact with food;
- Bedarfsgegenständeverordnung (Commodity Ordinance) implementing EU 10/2011 and EC 1935/2004 in Germany;

- Lebensmittel- und Futtermittelgesetzbuch (LFGB) - German Food and Feed Code;
  - BfR (Bundesinstitut für Risikobewertung) Recommendations on food contact materials.
  - Warenwetregeling verpakkingen en gebruiksartikelen (Commodities Act Packaging and Consumer Articles Regulation);
  - Nederlandse implementatie van EU 10/2011 en EC 1935/2004;
  - NVWA (Nederlandse Voedsel- en Warenautoriteit) richtlijnen en inspectie-eisen voor voedselcontactmaterialen.
  - ISO 22000 on food safety management;
  - ISO 9001 on quality management systems;
  - ISO 21898 on flexible intermediate bulk containers (FIBCs) for non-dangerous good;
  - ISO 13934-1 on tensile properties of fabrics;
  - ISO 12048 on filled transport packages;
  - SA 8000 on employee rights and well-being;
  - Regularly review and update policies and procedures to reflect changes in regulatory requirements.
- 
- ensures all packaging supplied to our customers meet all minimum legal requirements;
  - takes preventative measure to minimise any potential risk to customers;
  - ensures 100% of products distributed contain information to customers on health and safety issues associated with products;
  - achieve an annual Corrective Action Rate (CAR) of maximum 1.0 for each product group;
  - achieve an annual Order Reliability Rate (ORR) of 96.0 for each product group.

## Policy measures

LC Packaging:

- commits to meeting the minimum legal requirements in regard to health and safety of our customers;
- provides relevant documents to customers to provide crucial information regarding safe usage and any potential risks such as Material Safety Data Sheets;
- implements a quick and effective recall procedure in the event of defective products being delivered which could pose risk to our customers;
- continually assess the use of materials and processes used in the operation to ensure that all actions follow legal requirements, and to identify any improvements which could be implemented;
- ensures to label on the products all relevant safety information to our customers to ensure safe handling and usage;
- ensures to label on the products the risk to our customers that each packaging product poses to consumers in the form of warnings and precautions if misused;
- ensures to label on the products the relevant safe disposal of all packaging with advice on recycling methods available. Refer to our [Marketing & Labelling Policy](#) for more information;
- ensures all food packaging produced and delivered meets the HACCP certification requirements and ensure all employees have read and comply with the standard;
- packaging produced and delivered meets the FSSC 22000 and/or BRC Certification and/or any other GFSI approved scheme requirements for:
  - food/product safety;
  - packaging and packaging material;
  - storage and distribution.
- ensures all packaging produced to be in contact with food meets the minimum legal requirements and does not contaminate the food products in any way;
- ensures the quality of the packaging produced and delivered meets the minimum requirement for quality assurance as stated in ISO 9001;

- continually assesses the potential risks products or processes may have to customers;
- ensures all materials and textile used for the production meets the standard minimum legal requirements such as ISO 13934-1;
- ensures the use of hazardous substances is kept to a minimum in the production of packaging as stated in REACH;
- ensures to communicate, in the form of labelling, any hazardous substances which have been in use in the production of the packaging;
- ensures the recycled packaging produced meets the minimum legal requirements such as the Repak certification awarded to LC Packaging Ireland;
- ensures all food packaging produced and delivered meets the appropriate food safety expectations as stated in the policy presented by Dutch-Bangla Pack Ltd;
- ensures all packaging produced for stacking purposes meets the minimum legal requirements to ensure safety.

### Approval of policy

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

**Date:** 6 February 2025

**Signature:**

