

<p>Contact officer Corina 't Hoen</p> <p>Function HR Manager</p>	<p>Discrimination & Harassment Policy</p> <p>GRI 405: 103-1, 103-2, 103-3 GRI 406: 103-1, 103-2, 103-3</p>	<p>Issue date: 01 March 2019</p> <p>Review date: 14 September 2022 (V5.0)</p> <p>New review date: 14 September 2024</p>
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Introduction

LC Packaging International B.V. (LC Packaging) does not engage in or support activities that would interfere with an employee’s right to exercise, or to meet needs relating to gender, race, caste, national origin, religion, disability, sexual orientation, union membership or political affiliation. LC Packaging does not allow behaviour from its employees that is discriminative or harassing in nature. Gestures, language, and physical contact that are sexually coercive, threatening, abusive or exploitive are prohibited.

Purpose

The purpose of this policy is to provide information and guidelines regarding discrimination, harassment and bullying at LC Packaging. LC Packaging is committed to ensuring that all its employees are treated with dignity and respect, and that they treat others in the same way. The company believes that all colleagues have the right to work in an environment which is free from any form of discrimination, harassment, and/or bullying. This applies both in the workplace and outside the workplace in a work-related context, such as on business trips, customer or supplier events, or work-related social events. Additionally, this policy provides an overview of all objectives and measures regarding discrimination and harassment prevention.

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

At LC Packaging, harassment and/or discrimination towards employees or any other stakeholder is considered unacceptable behaviour. Anyone found to be in breach of this policy will be liable to disciplinary action.

The objectives of LC Packaging's Discrimination and Harassment Policy are:

- Comply with:
 - The Universal Declaration of Human Rights;
 - The United Nations Convention on the Elimination of All Forms of Discrimination Against Women;
 - The United Nations Convention on the Elimination of All Forms of Racial Discrimination;
 - The United Nations Women's Empowerment Principles (WEPs);
 - ILO Conventions 100 (Equal Remuneration);
 - ILO Conventions 111 (Discrimination – Employment and Occupation);
 - The International Covenant on Economic, Social and Cultural Rights;
 - The International Covenant on Civil and Political Rights;
 - WEPs (Women's Empowerment Principles).
- Comply with all other relevant local laws and regulations on discrimination and harassment.
- No involvement in or support for discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national, territorial, or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition that could give rise to discrimination.
- No acceptance of any behaviour that is threatening, abusive, exploitative, or sexually coercive, including gestures, language, and physical contact, in the workplace and, where applicable, in residences and other facilities provided by the company for use by employees.
- Never subject employees to pregnancy or virginity tests under any circumstances.
- Support discrimination monitoring and prevention initiatives.
- Ensure employees are educated with regards to the contents of this policy and the topic in general.
- Have zero reported incidents of discriminatory, intimidating, and harassing behaviour.
- Have an **80%** (or higher) rate of employees who have received trainings on preventing discrimination, harassment, and human rights violations.
- Have **25%** management positions filled by women by 2025.

Policy measures

With the following measures, LC Packaging strives to achieve its objectives:

- LC Packaging's Management Team is responsible for ensuring a safe working environment free from **bullying, discrimination and harassment** as described in this policy and must strive for zero incidents of discriminatory, intimidating and harassing behaviour every year.
- LC Packaging's management team is responsible for implementing a **zero tolerance culture** towards discrimination and harassment, by openly discussing topics related to a safe workplace during bi-annual flow meetings. In case of an incident, the manager must openly condemn discriminating behaviour and take appropriate action to prevent the incident from happening again.
- LC Packaging's HR Department is responsible for providing all new employees with the **Internal Code of Conduct** and ensure employees sign for receipt. This Code describes the way LC Packaging employees are expected to behave and the basic rules that must be followed to prevent situations where employees feel discriminated, intimidated, humiliated or (sexually) harassed. Any adjustments or additions to this Code of Conduct must be communicated within 3 months of the adjustment or addition.
- LC Packaging employees, interns and contractors must complete the online mandatory **Discrimination and Harassment Awareness Training Course** and **Human Rights Awareness Training Course** within the first 3 months of employment, or within 3 months of publishing a new mandatory course.
- LC Packaging's HR department and HR departments of LC Packaging's production sites are responsible for having informal and formal complaints procedures in place, such as an extensive **Whistleblowing procedure** and **Grievance Procedure** to enable employees to report misconduct related to discrimination and harassment. Annual attention must be paid to the existence of these procedures.

- LC Packaging's Site Management is responsible for **implementing preventive measures**, such as adopting the SA 8000 standard framework, and by performing regular risk assessments, internal audits, and evaluations on discrimination and harassment. Additionally, by implementing an additional local non-discrimination policy and communications focussed on local issues if the situation calls for it.
- LC Packaging's HR department is responsible for providing, in confidence, **advice and assistance to employees subjected to harassment and/or bullying** and assist in the resolution of any problems.
- LC Packaging's HR department is responsible for taking action to **avoid discrimination while recruiting staff** by implementing a fair and transparent recruitment procedure, using non-discriminatory language, advertising widely, refraining from referencing characteristics like age, race or sex, and avoiding unconscious bias, both in job descriptions and in job interviews.
- The HR departments of LC Packaging International, DBPL, and LCSH are responsible for conducting the [Women's Empowerment Principles Gender Gap Analysis](#) to **assess gender equality performance** across the workplace, marketplace, and community. The outcome of this analysis should be used to identify concrete actions to ensure gender equality.
- LC Packaging's Management Team is responsible for **ensuring gender equality** and must ensure a healthy balance between men and women. Equal rights, opportunities, and responsibilities must be ensured and promoted, with help of e.g., equal pay monitoring and a fair gender division in job promotions and participation in educational programmes, such as Young LC and the Leadership Programme.
- LC Packaging's HR department is responsible for annual data collection and transparently **reporting on incidents of discriminatory, intimidating and harassing behaviour**, and gender and age related labour data, such as number of employees, employee hires, promotions, turnover, and management positions. LC Packaging's affiliates and production sites are responsible for the timely and complete delivery of data to the HR department. All data on discrimination and harassment and equality is publicly disclosed according to Global Reporting Initiative Standard (GRI) in LC Packaging's annual [Sustainability Report](#).
>read more in [2021 People Report](#).

Discrimination, harassment and bullying procedure

All allegations of discrimination, harassment and/or bullying will be dealt with seriously, promptly, and in confidence. Employees who feel that they have been subject to harassment and/or bullying must not hesitate in using this procedure nor fear victimisation. Retaliation against an employee who brings a complaint of harassment and/or bullying is a serious disciplinary offence which may constitute gross misconduct and could result in dismissal.

1. If you are in any doubt as to whether an incident or series of incidents which have occurred constitute discrimination, harassment, and/or bullying, then in the first instance you should **approach your supervisor on an informal confidential basis**. They will be able to advise you as to whether the complaint necessitates further action, in which case the matter will be dealt with formally or informally as deemed appropriate.
2. If an incident happens which you think may be discrimination, harassment, or bullying, you may prefer to initially attempt to **resolve the problem informally, if you feel able to do so**. In some cases, it may be possible and sufficient to explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends you or makes you uncomfortable, and that it interferes with your work. You should make it clear that you want the behaviour to stop.
3. In circumstances where this is too difficult or embarrassing for you to do on your own, you could **seek support from a friend at work or your Managing Director**. If the incident concerns a customer or other third party, you may wish to ask your manager to intervene for you on an informal basis.
4. If the conduct continues, or if it is not appropriate to resolve the problem informally, or you do not feel able to raise it informally, you should **raise a formal complaint using the procedure set out in our Whistleblowing Procedure**.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 14 September 2022

Signature:

