

Contact officer: Corina 't Hoen Function: HR Manager	Employee Occupational Health & Safety Policy GRI 403: 103-1, 103-2, 103-3, 403-1, 403-3, 403-4, 403-5, 403-6,	Issue date: 18 January 2019 Last review date: 27 September 2022 (V5.0) Next review date: 27 September 2024
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Introduction

LC Packaging International B.V. (LC Packaging) considers employee health and safety as a material pillar towards successful organisational growth. The responsibility towards health and safety must be shared throughout all LC Packaging operations. This helps to protect LC Packaging's employees from danger and work-related health risks, and reduces the number of accidents at work. Its people are the company's greatest asset and as a member of the UN Global Compact, LC Packaging supports, respects, promotes, and protects internationally proclaimed human rights and does its utmost to provide safe, healthy, and satisfying working conditions.

LC Packaging considers a healthy and safe working environment to be an environment in which there is absence of harmful conditions that can cause injury and illness, and an abundance of health promoting ones.

Purpose

This policy outlines LC Packaging's commitment to providing a safe and healthy work environment for its employees. The purpose of this policy is for everyone associated with the company to know LC Packaging's health and safety aims and objectives and how they are achieved. This policy should help to create a safe working environment, protecting employees from potential injuries and health issues.

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

The objectives of LC Packaging's Employee Occupational Health and Safety Policy are:

- Establish and maintain a safe and healthy working environment.
- Monitor the work/life balance of our employees and promoting exercise.
- Comply with the OSH Framework Directive.
- Ensure that main production facilities comply with SA8000 guidelines.
- Ensure procedures are in accordance with the ISO 45001 Standard.
- Comply with (ESG) standards of investment partners, such as the Dutch Development Bank FMO and the German DEG.
- Comply with other relevant local laws and legislations related to a health and safe working environment.
- Prevent accidents and injuries in the workplace.
- Protect health and safety of individuals within the scope of LC Packaging's operations by providing protective and preventative measures.
- Reduce absenteeism from work.
- Have an annual Lost Time Injury Rate below **0.2**.
- Have an annual Lost Time Severity Rate below **0.1**.
- Raise awareness among relevant stakeholders with regards to occupational health and safety.
- Have an annual average of **2** hours of health and safety training per employee per year.
- Have the Occupational Health & Safety Awareness Training Course completed by at least **80%** of employees.
- Ensure that health and safety related concerns are addressed in timely manner.
- Have **85%** of its employees feel that he/she works in a safe and healthy working environment and is satisfied with the working conditions the company provides.

Policy measures

LC Packaging strives to achieve its health and safety objectives with the following measures:

Training and awareness

- LC Packaging's HR Department is responsible for providing all new employees with the **Internal Code of Conduct** and ensure employees sign for receipt. Any adjustments or additions to this Code of Conduct must be communicated with all employees within 3 months of the adjustment or addition.
- LC Packaging employees must read and strictly follow the rules and regulations on occupational health and safety as described in the **HR Manual**, such as regulations on personal hygiene, visitors regulations, harmful noise, forklift rules, and following measures to prevent RSI.
- LC Packaging employees, interns and contractors must complete the online mandatory **Occupational Health and Safety Training Course** and the **Business Ethics Awareness Training Course** within the first 3 months of employment or within 3 months of publishing a new mandatory course.
- LC Packaging affiliate management is responsible for maintaining an annual **completion rate** of the Occupational Health and Safety Training course and the Business Ethics Awareness Training course of at least **80%**.
- LC Packaging's International HR Department is responsible for **educating** affiliates on health and safety objectives and measures, by for example including the health and safety topic in the HR Learning Circle Programme.
- LC Packaging must annually **measure employee satisfaction** on health and safety working conditions via its Employee Enthusiasm Surveys (Flow) and discusses the topic in dedicated Flow team sessions. The input coming from these sessions must be collected by the HR department and used to improve health and safety.

Employee health and safety

Employee health and safety focusses on individual needs, such as improving access to health services and information, fostering a respectful and safe company culture where discrimination and harassment are not accepted, as well as building the knowledge and skills of workers to adopt healthy lifestyles.

- LC Packaging's HR Department and local HR employees are responsible for offering **secondary benefits** that contribute to the health and safety of its employees, such as providing free preventive medical examinations, access to a company coach/psychologist, free massages, a fit20 work-out programme during working hours, and a bicycle plan.
- HR Departments at LC Packaging production facilities DBPL and LCSH are responsible for offering **secondary benefits** that contribute to the health and safety of its employees in developing countries, such as providing an in-house doctor service and female nursing, a free health insurance and free basic health check-ups, medical advice and vaccination programmes to ensure every employee has access to proper medical care.
- LC Packaging's Management Team is responsible for ensuring a safe working environment free from **bullying, discrimination and harassment** as described in LC Packaging's [Discrimination and Harassment Policy](#).
- LC Packaging's Management Team is responsible for ensuring good **working conditions** and respecting **human rights** as described in LC Packaging's [Working Conditions Policy](#) and [Human Rights Policy](#).
- LC Packaging's site management is responsible for ensuring the safety of (female) employees by having **guards** in place to protect them when needed.

Safe and healthy working environment

A **safe and healthy working environment** provides a physical work environment that protects employees from dangerous incidents and injuries, that supports healthy choices and offers resources to actively encourage healthy behaviour.

- LC Packaging's International HR department and Quality Department must **provide support** to LC Packaging affiliates if requested in order to prevent accidents and injuries in the workplace.
- LC Packaging's International Quality Department is responsible for executing **regular checks** to make sure the health and safety management system is in place and strictly in compliance.
- LC Packaging's affiliate and site management is responsible for maintaining an annual **Lost Time Injury Rate** below 0.2 and an annual **Lost Time Severity Rate** below 0.1.
- LC Packaging's affiliate and site management is responsible for providing its employees with a **safe and healthy working environment**, by providing protective and preventative measures to prevent accidents and injuries in the workplace. These measures include e.g., clear H&S procedures and guidelines, fire safety measures, personal protective equipment, and regularly assessing the risks of its operations and change of operations with the use of health & safety risk assessments.
- LC Packaging's warehouse and site management is responsible for sufficiently informing its employees about the **hazardous substances and safety procedures** regarding these substances, and for safe hazardous material and equipment handling by ensuring proper storage and disposal, minimising the negative effects on employees and environment.
- LC Packaging's warehouse and site management is responsible for maintaining all **machinery** in good condition with regular safety inspections and for all machinery being handled with the utmost care by providing employees with machine handling training and guidelines. Forklifts must only be operated by trained personnel.

Employees under 18 are not allowed to work in areas of increased risk to their health and safety!

- LC Packaging's affiliate and site management is responsible for meeting **fire safety standards**, with measures such as fire alarm systems, emergency lighting, sufficient signage and fire hydrants/ hoses. All LC Packaging locations must be equipped with evacuation plans and routes and fire evacuation drills must be performed at least once a year.
- An **accident response procedure** must be available for all LC Packaging locations.
- LC Packaging affiliate and site management, and local HR, Quality or Health & Safety employees are responsible for providing all employees and visitors with **health & safety procedures** in English, or if needed, translated into local languages.
- LC Packaging's International and local HR departments must provide all employees with **disabilities** with necessary equipment upon request.
- LC Packaging affiliate and site management is responsible for having **first aid** certified members of the staff available at its premises at all times.
- LC Packaging's International Quality Department is responsible for **material data documentation**, through material safety data sheets and chemical data safety sheets.

Compliance, accountability and reporting

- LC Packaging's affiliate management is expected to **monitor, identify, check, and improve health and safety** risks within the workspaces continuously and ideally comply with the ISO 45001 (Occupational Health and Safety) Standard. Affiliates should be audited on at least a bi-annual basis to assess health and safety in the workplace and implement appropriate corrective and preventive actions. Affiliate management is held accountable for accidents and injuries occurring as a result of non-compliance and thus could have been prevented.
- LC Packaging's main production facilities DBPL and LCSH must ensure **proof of compliance** with health and safety standards at all times, via either an ISO 45001 certification, or a SMETA or BSCI audit report. Site management is held accountable for accidents and injuries occurring as a result of non-compliance and thus could have been prevented.

- LC Packaging's HR Department is responsible for annual data collection and **reporting on health & safety indicators**, such as incidents, sick hours and lost time (injury) rate, and hours of health & safety training conducted. LC Packaging affiliates and production facilities are responsible for the timely and complete delivery of data to the HR department. All data on health and safety is publicly disclosed according to Global reporting Initiative Standard (GRI) in LC Packaging's annual [Sustainability Report](#).

>read more in [2021 People Report](#).

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 27 September 2022

Signature:

A handwritten signature in black ink, appearing to read 'Lucas Lammers', written over a horizontal line.