

Contact officer: Lotte Mastwijk Function: Manager Sustainability & Communication	Human Rights Policy GRI 408: 103-2, 103-2, 103-3 GRI 409: 103-2, 103-2, 103-3 GRI 412: 103-2, 103-2, 103-3	Issue date: July 2017 Last review date: 12 October 2022 (V5.0) Next review date: 12 October 2024
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Introduction

LC Packaging International B.V. (LC Packaging) believes that everyone must be treated with dignity and respect and provided with basic human rights. This is of the utmost importance to LC Packaging as it has operations in locations that are considered risk countries where degradation of human rights is prevalent. LC Packaging aspires to be a leader in social accountability by promoting a positive culture with respect to human rights. The company supports and respects the protection of international human rights within the sphere of its influence and ensures that it is not complicit in human rights abuses.

LC Packaging has launched its [2030 Ambition](#) in May 2022 and has identified three global issues that urgently need to be addressed and where the company can make a major impact: **working poverty, waste and pollution** and **climate change**. In an attempt to fight working poverty and child labour and to ensure equal pay for equal work, LC Packaging has set itself the following ambitious goal:

By 2030, 100% of our key production partners' employees earn at least a living wage.

> [More information](#)

Purpose

The purpose of this policy is to ensure that LC Packaging is not involved in any practices that are harming human rights, and to avoid situations in which the company cannot guarantee grant basic human rights. In addition, it is to inform all employees of the measures LC Packaging takes in order to ensure sufficient labour conditions, specifically regarding labour relations (social dialogue), child and forced labour, and human rights. Informing employees of the measures LC Packaging takes also provides them insights into the rights they have as employees with regard to labour practices.

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 identifies the following objectives:

- Comply with national laws and legislation of the countries in which LC Packaging operates.
- Comply with ILO conventions:
 - 29 regarding forced labour;
 - 105 regarding abolition of forced labour;
 - 87 regarding freedom of association;
 - 98 regarding right to organise and collective bargaining;
 - 182 regarding worst forms of child labour.
- Comply with SA8000:2014:
 - National Child Labour Elimination Policy 2010.
- Comply with the:
 - Universal Declaration of Human Rights;
 - UN Convention on the Rights of the Child;
 - UN Guiding Principles on Business and Human Rights.
 - UN Women Empowerment Principles (WEPs) ([CEO Statement of Support](#))
- Commit towards Sustainable Development Goals (SDGs) 8 – decent work and economic growth, and 12 – responsible consumption and production.
- Strengthen the commitment towards SDG 17, by intensifying existing partnerships and establishing new partnerships to fight working poverty and eliminate human rights violations in the supply chain.
- Promote the importance of human rights in the value chain, e.g., in cooperation with organisations such as Social Accountability International (SAI), the UN Global Compact and Sedex.
- Have at least an **8/10 EcoVadis Score** on 'Labour and Human Rights' and 'Sustainable Procurement'.
- Have **zero** reported incidents of discriminatory, intimidating and harassing behaviour.
- Have **zero** reported incidents of child labour and forced labour.
- Have **100%** of employees to have received and signed an employment contract.
- Have **25%** of management positions filled by women by 2025.
- Ensure all employees are aware of the rights they have regarding labour practices and human rights by providing regular training courses.
- Have at least **80%** of LC Packaging employees complete the **Child and Forced Labour Awareness Training**, the **Discrimination and Harassment Awareness Training**, and the **Sustainable Procurement Awareness Training**.
- Have at least **90%** of LC Packaging employees complete the **2030 Ambition Living Wage Course** by 2022.

- Have **100%** of LC Packaging employees involved in purchasing or sales complete an **e-course on the Decent Work and Labour Standards in Global Supply Chains** by 2023.
- Have **100%** of LC Packaging locations and supplier operations covered by a human rights risk assessment, performed by LC Packaging.
- Have **100%** of key Production Partners assessed on an annual basis on topics such as human rights, child- and forced labour, and the freedom of association and right to collective bargaining from 2023.
- Have **100%** of its employees on sites in developing countries covered by formally-elected employee representatives (e.g. Works Council) or Unions.
- Have **100%** of Key Production Partners' employees to earn at least a living wage by 2030.
- Have **100%** of Key Production Partners to commit to LC Packaging's 2030 Ambition by September 2023 and have signed the Global Key Supplier Code of Conduct.
- Have **100%** of Key Production Partners in risk areas without proof of living wage join the 'LC Packaging Living Wage Programme' by 31 December 2023.

Policy measures

LC Packaging strives to achieve its objectives with the below measures. In this chapter detailed consideration is given to the following topics: 'freedom of association and collective bargaining', 'forced labour', 'child labour' and 'gender equality'.

- The HR department of LC Packaging International, DBPL, and LC Shankar are responsible for providing employees with a clear method through which unethical practices such as child or forced labour and violations of human rights can be reported, such as the **whistleblowing procedure**, and a **grievance procedure** to voice personal concerns regarding working conditions.
- All LC Packaging employees, interns and contractors must complete the online mandatory **Child and Forced Labour Awareness Training**, the **Discrimination and Harassment Awareness Training** and the **Sustainable Procurement Awareness Training** within the first 3 months of employment or within 3 months of publishing a new mandatory course.
- 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 International Quality Team, Product Managers and Sustainability Manager are responsible for strictly following and updating the **supplier selection and assessment procedure** to ensure human rights due diligence and eliminate violations in the company's supply chain.
- LC Packaging's Production Partners must comply with all **Labour and Human Rights Standards** related to child, forced and compulsory labour, non-discrimination, anti-harassment and abuse, fair wages and benefits, freedom of association and the right to collective bargaining, and working hours and documents, as described in the Supplier Code of Conduct.

- LC Packaging's HR Department and Quality department are responsible for annual data collection and transparently **reporting on confirmed incidents of discriminatory, intimidating and harassing behaviour, confirmed incidents of child labour and forced labour, employees who received an employment contract, operations covered by a human rights risk assessment** (internally and externally audited), 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 is publicly disclosed according to Global reporting Initiative Standard (GRI) in LC Packaging's annual [Sustainability Report](#).
>read more in [2021 People Report](#) and [2021 Business Ethics Report](#)

Freedom of association and collective bargaining

LC Packaging upholds the freedom of association and the effective recognition of the right to collective bargaining. LC Packaging's affiliate and site management **must**:

- respect the right of employees to form, join, and organise trade unions of their choice and to bargain collectively on behalf of their organisation at all times;
- inform employees that they are free to join worker organisations of their choosing without any negative consequences or retaliation;
- ensure that all employees are heard and can voice concerns related to the terms of their employment;
- not interfere with the establishment, functioning, or administration of employees' organisations or collective bargaining, and allow employees to freely elect their own 'employee representatives';
- ensure that employees are not subjected to discrimination, harassment, intimidation, or retaliation for being union members, employee representatives or engaged in organising employees;
- establish an agreement with trade unions regarding wages and other conditions of employment where applicable, and have regular meetings with the union to ensure all requirements are met.

If the right to freedom of association is restricted by law, alternative means to implementation of free association must be facilitated.

Forced labour

LC Packaging's affiliate and site management must under no circumstances engage in or support forced, compulsory, or indentured labour or modern slavery in any of its forms, or be involved in human trafficking, and therefore **must never:**

- require workers to pay “deposits” or lodge their identification papers, such as passports, birth certificates, religious records of age, travel documents, or any other documents that may have legal impact on worker's legal status, freedom to travel, leave the job;
- charge recruitment or employment fees or costs directly or indirectly to workers;
- withhold or threaten to undertake any negative actions on employees' wage, benefits, property, or documents in order to force personnel to continue working for LC Packaging
- refrain employees from leaving the workplace premises after completing a standard workday;
- refrain employees from terminating their employment contracts, provided they give reasonable notice;
- provide barriers to restrict/ prevent the free movement of employees inside the premises;
- engage in or support trafficking of human beings;
- associate with any labour supplier or subcontractors using labour suppliers who may be trafficking workers;
- introduce or allow involuntary overtime work.

Additionally, all employees should receive a written employment contract/ appointment letter signed voluntarily, entailing terms and conditions of employment. This contract should mention that the employee is free to leave employment with a notice period.

Deliberately breaking the rules listed above results in immediate dismissal!

Child labour

LC Packaging's affiliate and site management must not engage in any child labour practices, and therefore **must**:

- not recruit employees under the age of 18, with the exception of guided and paid internships for employees between 15 and 18. These young employees can only work outside of school hours or during 'internship hours', and may not work during night hours. Also, they may not be exposed to any situations -inside or outside the workplace – that are hazardous or unsafe to their physical and/or mental health development;
- always check legitimate identification for the verification of age before recruiting potential new employees. These forms of identification include:
 - Personal Public Service number;
 - Passport;
 - Government ID;
 - National identity card;
 - Birth certificate;
 - School certificate;
 - Medical certificate from registered doctor.
- keep a record of all employee ages in each employee's 'file'.

Deliberately breaking the rules listed above results in immediate dismissal!

In case child labour is discovered in LC Packaging's operations, LC Packaging will provide the subjected child with programmes which will help to enable that child to attend and remain in quality education until he/she is no longer a child.

Gender equality

- 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 the Leadership Programme and Young LC.
- LC Packaging's Management Team is responsible for achieving 25% of **management positions filled by women** by 2025.
- The Board of the LC Supports Foundation is responsible for **addressing gender in community projects**.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 12 October 2022

Signature:

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