

<p>Contact officer: Amela Hamzic</p> <p>Function: International Quality Manager</p>	<p>Materials, Chemicals, and Waste Policy</p> <p>GRI 306: 103-1, 103-2, 103-3 GRI: Sustainable production 2019</p>	<p>Issue date: 4 September 2018</p> <p>Last review date: 15 November 2019 (V2.0)</p> <p>Next review date: 15 November 2020</p>
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Introduction

Purpose

Hazardous materials and chemical substances are greatly detrimental to the environment and human health. It is a health and safety issue in workplaces, and exposure to some substances and materials can cause adverse health effects including chronic diseases. Although LC Packaging International B.V. (LC Packaging) is trying to minimise the usage of such materials and substances, they are still being used within operations. Therefore, LC Packaging has created this policy in order to provide pertinent information to both employees and management regarding hazardous materials, and chemicals. This information includes what processes and procedures we currently have in place in all aspects of dealing with hazardous materials and chemicals.

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 sites, specifically those that work in production sites and closely with hazardous materials, and chemicals.

The following products contain hazardous materials, and therefore this policy is more relevant for those closely working with the following products:

- Pest control (Pesticides)
- Printing (Ink, bleach, cleaning agents)
- Gluing (Glue)
- Cleaning (Cleaning Agents)
- Water treatment

Policy objectives

LC Packaging aims to:

- minimise the negative impact on the environment, and human health from the usage, and disposal of hazardous materials, and chemical substances;
- comply with all relevant local legislation regarding hazardous materials;
- minimise the impact of hazardous materials and chemical substances such as usage of better/safer ink type on products;
- reduce the usage of natural non-renewable resources within our operations;
- create an overview across years of all the products LC Packaging produces that contain hazardous materials or chemical substances, to lower the amount of products produced that contain hazardous materials;
- ensure disposal of materials, chemicals, and hazardous materials appropriately and safely;
- implement a waste management system in which disposal of hazardous materials is conducted without:
 - endangering human health;
 - harming the environment;
 - risk to water, air, soil, plants or animals;
 - causing a nuisance through noise or odours;
 - adversely affecting the countryside or places of special interest.
- ensure a safe working environment with regard to chemicals, and toxic waste;
- provide employees with adequate knowledge to safely handle chemical, and hazardous materials;
- provide employees with adequate health and safety knowledge on what to do if affected by, or in contact with chemicals, or hazardous materials;
- ensure that all products originating from new sources go through a safety test so as not to have any unsafe finished products;
- ensure product packaging does not use any hazardous substances in its ink;

- ensure there is an internal procedure to recall products in case products with hazardous materials or chemical substances reach the end consumer.
- take responsibility as a producer in case severe detrimental environmental or social impact arises from any of our products or operations;
- ensure providing end consumers with appropriate warning of the hazardous material in the product, and proper usage of the product;
- By 2022, have at least 80% of employees given awareness trainings on the safe handling of chemical and hazardous materials;
- Have a waste recycle rate of 50% by 2025.

Policy measures

LC Packaging strives to achieve the objectives with the following measures:

Risk minimisation

- Create an inventory of all hazardous materials, and chemical substances used or stored;
- Conduct risk assessments of hazardous materials or chemical substances used on sites/ projects with regard to the following:
 - Hazardous properties;
 - Safety data sheet provided by supplier;
 - Exposure (type, and duration);
 - Preventive measures to be taken;
 - Occupational exposure limit values or biological limit values;
- Conduct material safety tests to ensure no products contain excessive amounts of hazardous materials;
- Conduct yearly health assessments of those employees that are physically exposed to, and are closely working with hazardous materials or chemical substances;
- Conduct yearly assessments of the status of equipment used to handle, store, or move hazardous materials.

Labelling and packaging

- Labelling hazardous materials, and chemicals with appropriate warning signs, and labels;
- Packaging of products containing hazardous material must be labelled with:
 - The name of the substance;
 - The origin of the substance (manufacturer, supplier, or importer);
 - Danger symbol, and indication of danger involved in the usage of this substance.
- Mark areas, or rooms which store hazardous materials appropriately with a suitable warning sign or label.

Disposal and transportation

- Implement procedures for safe disposal of hazardous materials;
- Be transparent with all parties we are involved with, and inform them of the usage of our hazardous materials, the disposal, and recycling methods;
- Create a log of all hazardous waste which has been disposed of with regard to the following:
 - Quantity;
 - Type (nature of material);
 - Origin;
 - If relevant, destination;
 - Frequency of collection;
 - Mode of transport;
 - Treatment method.
- Monitor recycled or disposed hazardous materials and chemicals per year to have an overview of the hazardous materials and chemicals disposed of every year;
- Waste oils will be collected separately, if possible;
- Bio-waste are collected separately;
- Bio-waste are recycled in order to create safe materials from this waste;

- Transportation of hazardous materials and chemicals is to be done by trained professionals or certified third parties;
- All transportation of hazardous materials or waste is recorded;
- Implement emergency procedures for if hazardous materials leak during transportation.

General

- Practically use our waste management system with regard to hazardous materials and chemicals which is in accordance with the waste hierarchy of EU Directive 2008/98EC. This means the following for our hazardous materials, if possible:
 - Prevention;
 - Preparing for re-use;
 - Recycling;
 - Other recovery, e.g. energy recovery;
 - Disposal.
- Comply with voluntary regulations of printing inks for food packaging materials of the Japan Printing Ink Makers Association; ([LC Packaging Netherlands](#))
- Provide employees with a training regarding hazardous materials, and chemicals and how to handle them safely;
- Follow a 'Hazardous Chemical Substances Procedure' which contains information regarding: (LC Shankar)
 - Handling, and storing of hazardous chemicals;
 - Emergency responses regarding evacuation procedures, and medical treatment and assistance;

- Provide appropriate equipment for the handling of hazardous materials and chemicals;
- Implement procedures for containment of any spillage of hazardous materials during storage or transportation on water and land;
- Implement a withdrawal or recall procedure for all products.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 15 November 2019

Signature:

A handwritten signature in blue ink, appearing to be 'L. Lammers', written in a cursive style.