

<p><b>Contact officer:</b>          Name: Corina 't Hoen          Function: HR Manager</p>	<p align="center"><b>Discrimination &amp; Harassment Policy</b></p> <p>GRI 405: 103-1, 103-2, 103-3          GRI 406: 103-1, 103-2, 103-3</p>	<p><b>Issue date:</b>          01 March 2019</p> <p><b>Review date:</b>          02 March 2020 (Version 2.0)</p> <p><b>New review date:</b>          02 March 2021</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, observe tenets or practices, or to meet needs relating to 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 document is to provide information and guidelines regarding discrimination, harassment and bullying at LC Packaging. We are committed to ensuring that all our employees are treated with dignity and respect and treat others in the same way. We believe that all colleagues have the right to work in an environment which is free from any form of discrimination, harassment and/or bullying. It 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 current measures regarding discrimination and harassment prevention. All employees are required to read this policy and to ensure that they understand what types of behaviour are acceptable and unacceptable.

## 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.

## Policy objectives

Harassment and/or discrimination of any of our employees is unacceptable behaviour. Anyone found to be in breach of this policy will be liable to disciplinary action.

LC Packaging:

- aims to 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;
  - 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;
- aims to comply with all other relevant local laws and regulations;
- does not engage in or support 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;
- does not allow 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 personnel by the organization;
- does not subject personnel to pregnancy or virginity tests under any circumstances;
- supports discrimination monitoring and prevention initiatives;
- ensures employees are educated with regards to the contents of this policy and the topic in general;
- aims to have an 80% (or higher) rate of employees who have received trainings on preventing discrimination, harassment and human rights violations;
- by 2025, aims to have 25% of woman in management positions.

## Policy measures

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

- Maintain high standards with regards to zero tolerance towards discrimination and harassment within the organisation with SA8000 certification on main production site, which is a leading social certification standard;
- Discrimination and harassment prevention by performing self-audits on discrimination at sites such as Dutch-Bangla Pack Ltd.;
- Implement a Non-Discrimination Policy at our main production site such as at Dutch-Bangla Pack Ltd, which benefits from non-discrimination policy statement undersigned by the director of Dutch-Bangla Pack Ltd.;
- Implement a Complaints Policy at our production sites such as at Dutch-Bangla Pack Ltd., which benefits from reporting guidelines and formal and informal complaint procedures, which helps to report discrimination and harassment related misconduct;
- Protect our employees by having an extensive Whistleblowing procedure and Grievance Procedure. Employees can report the misconduct related to discrimination and harassment with the use of the guidelines presented within the document.
- Transparency and continuous improvement regarding discrimination and harassment by compiling an annual Communications on Progress Report for LC Packaging and Dutch-Bangla Pack Ltd. in alignment with the UN Global Impact with principle 6: elimination of discrimination;
- Organisation-wide involvement in issues such as Discrimination and Harassment at sites such as Dutch-Bangla Pack Ltd by assigning a Social Performance Team, which conducts risk assessments, internal audits and evaluations, while reporting back to workers;
- Raise employee awareness on discrimination and harassment by conducting an awareness training. It introduces the most common types of discrimination and discusses harassment and sexual abuse;
- Transparent reporting at sites such as LC Shankar on remuneration, disability, ethnic background and gender. By reporting on such elements, the organisation is able to set objectives that promote inclusion;

- Strive to provide an inclusive environment for people with disabilities by providing them with special equipment upon request;
- Gender equality and equal pay monitoring with the use of Risk Assessment Template and Self-Audit Checklist at sites such as Dutch-Bangla Pack Ltd.;
- Senior employee integration within the company's operations by providing workers with additional perks such as extra holiday days based on the employee's age.
- Provide, in confidence, advice and assistance to employees subjected to harassment and/or bullying and assist in the resolution of any problems;
- Prevent discrimination in recruitment by having a fair and transparent recruitment procedure;
- Job descriptions are free of discriminatory biases and the requirements for the job are job-specific. We refrain from referencing characteristics like age, race or sex.

## **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 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 appropriate.
2. If an incident happens which you think may be discrimination, harassment or bullying, you may prefer initially to 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 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.

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.

## **Sanctions**

This policy must be strictly followed by all employees and management. So, if there is any intentional disregard of the contents of this policy, LC Packaging will take disciplinary actions. Depending on the severity, and consequences of the breach of policy, appropriate disciplinary actions will be implemented. Please refer to the Sanctions Policy for more details regarding potential disciplinary actions.

## **Evaluation and review**

The contact officer in place for this policy is responsible for the evaluation and review of this policy every two years. This should be with regard to any legislation changes, or any changes in the company's operations as opening a new production site. Assistance on collecting necessary information such as changes in legislation in different regions can be obtained from the contact officer and employees from local locations. The contact officer is also responsible for communicating the changes made to this policy to all employees and management.

## **Approval of policy**

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

**Date:** 02 March 2020

**Signature:**

A handwritten signature in blue ink, appearing to be 'L. Lammers', written over a light blue circular stamp.