

<p>Contact officer: Name: Lotte Mastwijk Function: Communications & Sustainability Manager</p>	<p align="center">Human Rights Policy</p> <p>GRI 408: 103-2, 103-2, 103-3 GRI 409: 103-2, 103-2, 103-3 GRI 412: 103-2, 103-2, 103-3</p>	<p>Issue date: July 2017</p> <p>Last review date: 11 December 2019 (V3.0)</p> <p>Next review date: 11 December 2021</p>
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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 we have operations in locations that are risk countries where degradation of human rights is prevalent. We aspire to be a leader in social accountability by promoting a positive culture with respect to human rights. We support and respect the protection of international human rights within the sphere of our influence and ensure that we are not complicit in human rights abuses. We do what we can by ensuring that everyone under our employment receives basic human rights and is treated with dignity and respect. As a family company, we consider all our employees a member of the LC family, and we treat them as such.

Purpose

The purpose of this policy is to ensure that we are not involved in any practices that are harmful for human rights, and to avoid situations in which we cannot 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 we take 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, part time workers, interns, contractors of LC Packaging International B.V, its affiliates and production sites.

Policy objectives

LC Packaging's approach to human rights and labour practices is based on the "UN Guiding Principles on Business and Human Rights" and internationally accepted standards, such as the International Labour Organization (ILO), SA8000 and OHSAS 18001, depending on location of operation.

As a proud member of the UN Global Compact, we strongly support, respect, promote, and protect internationally proclaimed human rights, such as the Universal Declaration of Human Rights and do our utmost to provide safe, healthy, and satisfying working conditions for all our employees around the world. We eliminate all forms of forced and compulsory labour, child labour and discrimination and expect our production partners to do the same. Moreover, we uphold the freedom of association and the effective recognition of the right to collective bargaining. With our stance on issues of human rights such as child labour, forced labour, and freedom of association and right to collective bargaining, we have come up with the following objectives:

General

- Comply with national laws and legislation of the countries in which we operate;
- 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 the 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.
- Ensure employees are not exploited;
- Ensure employees are treated with dignity and respect;
- Ensure employees are provided with sufficient working conditions;
- Ensure employees are aware of the rights they have regarding labour practices;

- Ensure LC Packaging does not have any unfair labour practices taking place within its business operations;
- Communicate to employees the measures we take, and unacceptable practices;
- Have 100% by LC Packaging locations and supplier operations covered by a human rights risk assessment performed by LC Packaging
- Have 100% of our employees in developing countries covered by formally-elected employee representatives (e.g. Works Council) or Unions;
- By 2022, have 100% of operational sites been subject to human rights reviews or human rights impact assessments (as part of on-site audits).

Freedom of association and right to collective bargaining

- Ensure that all employees have the right to collective bargaining and freedom of association;
- Inform the workers about their right to collectively bargain, explaining that the membership to trade union does not entail any negative consequences for workers;
- Ensure that all employees are heard and can voice concerns related to the terms of their employment;
- Ensure no retaliation for any such activities.

Child and forced labour

LC Packaging:

- does not hire children under the legal age according to the national law in the area of operation. LC Packaging does not hire children under the age of 14 or the minimum working age according to convention 138 of the ILO;
- eliminates all forms of forced and compulsory labour, child labour, and discrimination and expect our production Partners to do the same;
- spreads awareness to employees regarding child labour and forced labour;
- provides employees with a clear method through which unethical practices such as child or forced labour can be reported;
- documents agreements to principles of remediation even if there is no known child labour employed.

Policy measures

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

Freedom of association and collective bargaining

LC Packaging:

- respects the right of all employees to form, join, and organise trade unions of their choice and to bargain collectively on behalf of their organisation;
- informs personnel that they are free to join a worker organisation of their choosing without any negative consequences or retaliation;
- does not interfere with the establishment, functioning, or administration of workers' organisations or collective bargaining;
- communication to workers within operations of LC Packaging, such as in Dutch-Bangla Pack Ltd., is undertaken by a "Worker representative". This is a worker who is chosen to facilitate communication with senior management on matters related to SA8000, elected by non-management personnel for that purpose;
- allows workers to freely elect their own representatives;
- ensures that representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation, or retaliation for being union members, representatives of workers or engaged in organising workers;
- production sites of LC Packaging, such as LC Shankar have agreements with trade unions regarding wages and other conditions of employment;
- production sites of LC Packaging, such as LC Shankar have regular meetings with a union and industrial relations consultants (IR consultant);
- includes clauses of collective agreements within its employment contracts in its locations, such as LC Packaging UK.

Forced labour

LC Packaging:

- does not engage in or support the use of forced or compulsory labour;
- does not require employees to provide “deposits” or lodge identification papers with us prior to the beginning of employment;
- does not require workers to pay “deposits” or transfer their identification papers. These can be documents 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, etc.
- does not withhold any part of any personnel’s salary, benefits, property, or documents in order to force personnel to continue working for LC Packaging;
- does not take or threaten to take any negative actions on worker’s wage, benefit, property to ensure that they continue working for LC Packaging;
- does not charge recruitment or employment fees or costs directly or indirectly to workers;
- employees have the right to leave the workplace premises after completing a standard workday;
- employees are free to terminate their employment contracts provided they give reasonable notice;
- ensures that any overtime work is fully voluntary;
- does not provide barriers to restrict/ prevent the free movement of worker’s inside the premises;
- does not engage in or support trafficking in human beings;
- takes active steps to ensure that they have no association with any labour supplier or subcontractors using labour suppliers who may be trafficking workers;
- has created an awareness training for employees that touches upon the topic of forced labour.

Child labour

LC Packaging:

- does not engage in any child labour;
- does not recruit under the age of 18; although, employees between 15-18 years can be accommodated if required in production sites such as Dutch-Bangla Pack Ltd, as employed for guided paid internships, or in office locations as guided paid internships;
- checks 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.
- keeps a record of all employee ages in each employee's "employee file";
- discovers any child labour going on within our business operations, we will provide the subjected child programmes which provide for the transition to enable that child to attend and remain in quality education until he/she is no longer a child;
- has created an awareness training for employees that touches upon the topic of child labour.

Human rights

LC Packaging:

- is a member of the UN Global Compact and hence promotes, uses and reports on internationally proclaimed human rights standards;
- has been SA8000 certified in our production site Dutch-Bangla Pack Ltd.;
- funds social initiatives such as providing youth training for a specific skill so that they are not forced into child labour where they do not work in safe conditions;
- provides employees with a whistleblowing procedure for them to report on any practices that violate human rights;
- provides employees with a grievance procedure for them to voice personal concerns regarding working conditions.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 11 December 2019

Signature:

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