

<p>Contact officer: Name: Corina 't Hoen Function: HR Manager</p>	<p>Working Conditions Policy</p> <p>GRI 401: 103-1, 103-2, 103-3 GRI 403-3</p>	<p>Issue date: 17 December 2018</p> <p>Last review date: 2 December 2019 (V2.0)</p> <p>New review date: 2 December 2020</p>
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Introduction

At LC Packaging International B.V. (LC Packaging), we constantly strive to improve upon working conditions and support the employee's voice. We strive to do this in a transparent and sustainable manner. Every year, we take additional measures and try to improve upon our current measures.

Purpose

The purpose of this policy is to communicate and set out LC Packaging objectives and measures towards all employees with regards to working conditions.

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 FIBC production sites.

Policy objectives

LC Packaging aims to:

- Comply with:
 - UN Guiding Principles on Business and Human Rights;
 - Universal Declaration of Human Rights;
 - ILO Convention 1 (Hours of Work – Industry);
 - ILO Convention 116 (Reduction of Hours of Work);
 - ILO Conventions 100 (Equal Remuneration);
 - ILO Convention 131 (Minimum Wage Fixing);
 - ILO Convention 102 (Social Security – Minimum Standards);
 - ILO Convention 159 (Vocational Rehabilitation and Employment - Disabled Persons);
 - ILO Convention 183 (Maternity Protection);
 - ILO Convention 177 (Home Work);
 - National Labour Law 2006;
 - Minimum Wages Law 2010;
- comply with all other relevant rules and local regulations regarding working conditions;
- raise awareness among employees regarding working conditions in a transparent manner;
- inform employees about working hours and rest periods;
- ensure employee satisfaction/enthusiasm and engagement;
- ensure fair and transparent remuneration procedures;
- ensure employees receive appropriate holiday time and additional leave when required;
- ensure support is provided for employees who have children to care for;
- ensure flexibility in work schedules with time and location.
- By 2022, have employees of all locations being granted with paid annual vacation.
- By 2022, have 100% of employees in developing countries covered with a healthcare coverage or medical plan.

Policy measures

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

General

LC Packaging:

- ensures clear communication regarding working conditions with the use of the HR Manual. It consists of topics such as insurance, holiday allowance, absence, travel expense allowance, employee performance management, employee education, code of conduct and end of employment conditions;
- is an advanced member of the United Nations Global Compact, and as a result yearly writes Communication on Progress Reports, within this report all items related to labour practices are highlighted and reported upon, including remuneration, health care benefits, group insurance and recreational activities;
- ensures to provide its employees with working benefits in line with their job requirements such as laptops, vehicles, office equipment;
- ensures clear communication on working conditions to its employees before start of employment, by agreeing with the new employee on working conditions as written within an employment contract, read and signed by both the employee and employer.

Remuneration, overtime and atypical working hours

LC Packaging:

- complies with all applicable national laws and in its main production site with SA 8000 requirements concerning working hours;
- ensures that the wages paid to our employees at least meet the Basic Living Wage according to the SA 8000 standard;
- shall respect the right of personnel to the living wage and ensure that wages paid for a normal work week shall always meet at least legal or industry minimum standards and shall be sufficient to meet the basic needs of personnel and to provide some discretionary income shall ensure that personnel's wages and benefits composition are detailed clearly and regularly in writing for them for each pay period. The organisation shall also ensure that wages and benefits are rendered in full compliance with all applicable laws;
- shall not use labour-only contracting arrangements, consecutive short-term contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labour and social security;
- shall reimburse for overtime at a premium rate at Dutch-Bangla-Pack Ltd. as defined by national law and established by a collective bargaining agreement;
- at its operational sites, implements time tracking of its employees with the use of factory time cards to ensure all time worked is properly recorded and remunerated;
- allows overtime work to be voluntary and shall not exceed 12 hours per week under normal business conditions, nor be requested on a regular basis;
- ensures wage equality at sites such as LC Shankar by reporting on salaries earned among different categories of workers. This ensures transparency and helps set future objectives to improve wage equality;
- creates awareness amongst its employees on remuneration by providing a presentation on job structure and pay policy. LC Packaging ensures to provide extra pay for additional hours worked for blue collars and at locations such as LC Packaging Ireland, Dutch-Bangla Pack Ltd. and LC Shankar.

Holidays, additional leave and rest

LC Packaging:

- employees are offered additional leave days for special occasions and circumstances including engagements, weddings, to attend examinations and moving home;
- employees are offered emergency leave in order to give space and time to deal with unforeseen events which require immediate attention;
- allows employees to take compassionate leave to enable to cope with the death of a close relative, make necessary arrangements and attend the funeral;
- employees are granted maternity leave to enable the employee to spend quality time with the new child;
- employees are entitled to take care leave in order to look after those with a close relationship who require care;
- provides extra days of leave for senior employees;
- ensures employees receive one day off within a time frame of seven-consecutive days;
- has created an awareness training for its employees about annual holiday leave and additional leave to raise employee awareness regarding the topic.

Flexible working

LC Packaging allows employees to request for flexible working, under the following conditions: A flexible working request under this policy is a request to do one or more of the following:

- To reduce or vary your working hours (for example a request to work fewer hours per week);
- To reduce or vary the times you are required to work (for example to work on different days, or to start earlier or later in the day);
- To work from home instead of at your usual workplace or at another of our business locations, for some of your working time.

Healthcare, insurance and pension

LC Packaging:

- provides healthcare benefits or a medical plan at its production sites to all employees;
- provides its employees with social insurance, business travel insurance, liability insurance and 'Good Employer' insurance;
- organises pension plans for all its employees arranged per country of location.

Bonus schemes

LC Packaging:

- motivates its employees at its production sites such as Dutch-Bangla Pack Ltd. with the use of 'Star Allowance'. Each year Dutch-Bangla Pack Ltd. announces a 'Star Employee'. It encourages workers to attend their job duties more regularly;
- motivates its employees at its production sites such as Dutch-Bangla Pack Ltd. with the use of Attendance Allowance;
- provide bonuses in the form of intrinsic and extrinsic rewards based on positive work performance.

Employee enthusiasm, communication and engagement

LC Packaging:

- ensures employee engagement with the implementation of 'Flow Manager Programme', which enables employee engagement monitoring three times a year, allowing employee engagement improvements;
- conducts enthusiasm surveys with the Flow Manager Programme. As well as conducts satisfaction surveys, at sites such as LC Shankar, to identify the employees' levels of satisfaction and creates a report to establish areas of improvements.

Childcare

LC Packaging:

- has a transition period for mothers who are returning to work after maternity leave to initially work part-time before transitioning to full time;
- grants employee's permission to attend important events such as parent-teacher conferences, child medical appointments, and any other events by allowing employees to leave during the day as long as this is communicated to management and a decision is made for the employee to come into later in the day or leave early;
- at its main production location is planning to provide on-site childcare services in order to allow children to be looked after but kept close by for parent's peace of mind;
- enable breastfeeding at work through paid breastfeeding breaks, adequate lactation facilities and a supportive breastfeeding environment in the workplace.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 2 December 2019

Signature:

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