

UNITED NATIONS GLOBAL COMPACT COMMUNICATION ON PROGRESS

Bulleh Shah Packaging (Private) Limited

[A Stora Enso – Packages Joint Venture]
Period: Jan 2015 to Dec 2015

CEO Statement of continued support in 2015

To our stakeholders:

I am pleased to confirm that Bulleh Shah Packaging (Private) Limited reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Ali Aslam

Chief Executive Officer

25st January, 2016



A Stora Enso - Packages Joint Venture

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HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses

ASSESSMENT, POLICY AND GOALS

Bulleh Shah Packaging (BSP) is committed to educate its employees, suppliers, business partners and stakeholders to acknowledge and respect Universal Declaration of Human Rights. Our Code of Conduct is built on our values, care for people and our commitment to follow International Human rights conventions, laws and best practices. We have also incorporated basic human rights in our Suppliers Sustainability Requirements (SSR).

IMPLEMENTATION

BSP code of conduct (CoC) documents its understanding and responsibility In following four major areas

- Environment
- People
- Responsible Business Practices
- Compliance to Law

The summary of Code of Conduct (printed as a pocket guide) is handed over to each employee and BSP's commitment to its CoC is communicated to the workforce through awareness sessions and trainings. All employees and workers are encouraged to commit to the CoC by signing a" Responsibility Pledge". A comprehensive CoC document is shared on BSP's internal intranet portal as well. Awareness sessions are being conducted for employee, workers and contract workers to raise awareness on human rights, environment, fair Business practices, and compliances to all legal requirements.

Also the below measures were taken for the better workplace

- Canteens for workers
- Rest area for shift drivers
- Safety equipment for workers including contractual workers



BSP has certain procedures to support human rights:

BSP Code of Conduct

- Compliance to Human and Labour rights We respect, support and fully observe international human and labour rights
- Responsible Corporate citizenship— We respect the cultures, customs and values of local people and societies in regions where we operate
- Diversity of thought Building diverse teams is a priority for us
- Safety, health and well-being We take responsibility for the safety, health and well-being of our people

Human resource policy

- BSP offers all employees equal employment opportunity. It forbids discrimination on the basis of religion, caste, creed, sex, marital status, disability etc.
- BSP aims to take a lead in promoting equal opportunity gender equality
- BSP has zero tolerance for sexual harassment

Gender Policy

• BSP has a Gender Policy to handle gender discrimination

Women Rights

Integrity, openness and mutual respect form the fundamentals of our corporate culture. BSP remains committed to making a better work environment for all its stakeholders including women. It aims to provide a work atmosphere that is established through equal opportunities and inclusion.

Our recognition of Women Rights in all our policies and decisions support equality between women and men and assist in assimilating women in all spheres of BSP operations and culture.

Whistle blowing procedure

We encourage our employees to question, discuss, and share information regarding any suspected irregularities or violations against the Code of Conduct. Suspected areas in this regards are

- Corruption
- Misappropriation of financial data/reports
- Misuse of company assets



- Violation of national and international law
- Action raising safety, security and environmental concerns
- Women Rights
- Damage to BSP's reputation
- Disrespect and discrimination
- Violation of information security

MEASUREMENT OF OUTCOMES

BSP has a process to identify breaches in its own premises and in suppliers' against defined policies and guidelines. BSP GR team creates awareness and provides guidance, trainings and action plans to cover identified gaps within agreed time frame.

This year we conducted more than a hundred sessions at all our three work facilities; Lahore, Kasur and Karachi. 98% of BSP staff as well as contract workers have been trained against Code of Conduct. CoC feedback sessions were also conducted to further gauge the learning and understanding of BSP employees.

By the end of 2015, we were able to achieve most of the recommended actions highlighted in the Human Rights Risk assessments conducted in 2014 by an International HR Institute.



LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

ASSESSMENT, POLICY AND GOALS

BSP respects and supports UNGC principles on labour standard and incorporates them in policies and guidelines. BSP's Code of Conduct and Suppliers Sustainability Requirements do not allow the company to practice any illegal or unethical labour practices including child labour, forced or compulsory labour.

We comply with the labour laws of Pakistan and the related international laws and standards.

IMPLEMENTATION

BSP suppliers are encouraged to comply with our sustainability requirements by signing the SSR document. Gap analysis of suppliers is done based on the SSR. A copy of the BSP SSR document is shared on company's Intranet Portal. Trainings are conducted for management, employers and suppliers to raise awareness regarding issues related to child labor and company's compliance to Child & Labour Rights, Forced labour and discrimination of workers/employees as per UNGC principles and legal requirements.

MEASUREMENT OF OUTCOMES

Global Responsibility department at BSP over sees risks and gaps and provides advice through policies, training, and audits. In 2015, almost 300+ suppliers were audited and trained against BSP Suppliers Sustainability Requirement (SSR).



ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ASSESSMENT, POLICY AND GOALS

We at BSP understand the significance of environment and have incorporated it in Code of Conduct as well as in our Suppliers Sustainability Requirements (SSR). BSP's Integrated Responsibility approach encourages actions to minimize waste, optimize the use of energy and materials, and ensure eco-friendly waste processing.

IMPLEMENTATION

Awareness sessions are held to make the employees aware of the BSP integrated approach and related policies and procedures for protection and conservation of environment. We have an advanced effluent treatment plant. Also BSP is working on environment friendly disposal of sludge. Designated internal teams are responsible for the audits of the mill and suppliers.

To ensure its environmental responsibility, BSP is continuously improving the efficiency of effluent treatment plant.

MEASUREMENT OF OUTCOMES

In 2015, BSP has also achieved environmental utilities targets.

Certifications and compliances include:

ISO 14001:2005 - Environmental Management System, FSC COC - Forest Stewardship Council Chain of Custody



ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

ASSESSMENT, POLICY AND GOALS

BSP recognizes that doing business with integrity is the only right way of doing business and we continue to leverage opportunities to share learning and ethical practices across BSP to develop a responsibility culture. The **Anti-Corruption and Bribery Policy** of BSP provides guidance and procedure on how to conduct business in a fair, ethical and legal manner.

IMPLEMENTATION

Some potential risk areas were highlighted and training was provided to relevant staff. Policy related pledge card is also signed by employees after training session to ensure compliance to Anti-Corruption and Bribery Policy and develop a culture free of bribery and unethical practices.

MEASUREMENT OF OUTCOMES

Anti-corruption and Bribery Policy compliance is verified through independent Internal Audits 88% of Management team, Managers and Executives have been trained for Anti-Corruption and Bribery Policy and Whistle Blowing procedure till date. Necessary actions are also taken on whistle blowing cases as per procedure.

