

2017

UN Global Compact Communication on Progress Report 2017



Abdul Mumit
Deputy Managing Director
Dutch-Bangla Pack Ltd
September 2017

Statement of continued support by the Managing Director:

I am pleased to confirm that Dutch-Bangla Pack Ltd. supports the ten principles of the Global Compact on human rights, labor, environment and anti-corruption. With this communication, we express our intent to implement and develop those principles. We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Dutch-Bangla Pack Ltd. will make a clear statement of this commitment to its stakeholders and the general public.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the Global Compact, and annually thereafter according to the Global Compact COP policy. This includes:

- A statement signed by the chief executive expressing continued support for the Global Compact and Renewing our ongoing commitment to the initiative and its principles. This is separate from our initial Letter of commitment to join the Global Compact.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the Global Compact principles in each of the four issue areas (human rights, labor, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Yours Sincerely,



Abdul Mumit

Deputy Managing Director



Statement of continued support by Board of Directors

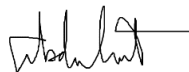
We hereby confirm that Dutch-Bangla Pack Ltd. supports the ten principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption. With this communication, we express our assurance to implement and develop those principles. We are committed to making the Global Compact and its principles as part of corporate strategy, culture and day-to-day operations of our company and to engaging in collaborative projects which advance the broader development goals of the United Nations.

Starting from our products, to the way we treat our employees & other stakeholders, to the manner in which we serve the communities we work in, we are committed to create an environment that not only advances our business goals, but also serves the greater interest of the country and nation.

We have 'sustainable development' at the core of our values and business activities. We believe our enterprise should grow up with society, for the greater benefit of all. Our individual and collective efforts are in line with the mission of our business, which is to serve the community.

We support public accountability and transparency, and therefore commit to assume responsibility & oversight for long-term corporate sustainability strategy & performance. Our CSR programs, in this regard, are aimed at those who are impacted by our operations directly- our employees, consumers of our products, all other stakeholders, the locality in which we operate, or the environment. This allows us to be socially and environmentally sustainable.

On behalf of Board of Directors of Dutch-Bangla Pack Ltd.,



Abdul Mumit

Deputy Managing Director

Human Rights Principles

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Make sure that they are not complicit in human rights abuses.

Assessment, Policy and Goals:

Dutch-Bangla Pack Ltd (DBPL) promotes a positive culture and the continuous improvement of working conditions with respect to human rights. We support and respect the protection of internationally proclaimed human rights within the staff, including directors, executives, management, supervisors and staff, whether directly employed or contracted. DBPL shall continue to encourage all suppliers and contractors to comply with the same standards.

Implementation:

- I. **Employee Handbook:** DBPL has developed an Employee Handbook in February 2016 to protect the human rights of all employees according to global human rights proclamation and standards. Following agendas are included in the handbook:
 - Equal Employment Opportunity Policy
 - Employment at Will
 - Policy against Harassment & Discrimination
 - Grievance Policy
 - Disciplinary Policy
 - Open Door Policy
 - Confidentiality Policy
 - Drug & Alcohol Policy
 - Various HR Processes & Employee Benefits
 - Work Related Accident & Injury
 - Company Work Rules etc.

The handbook is available in both Bangla and English languages to ease communication and maintain smooth compliance.

- II. **Occupational health and safety:** The company maintains a well-defined occupational health and safety policy. To improve occupational safety, prevent injury and ill health of employees and avoid property and infrastructure damage, DBPL periodically conducts a comprehensive Hazard Identification and Risk Assessment (HIRA) exercise. The purpose of the exercise is to identify high risk hazards and implement emergency management programs to minimize the same by prevention, mitigation, preparedness, response and recovery measures. To maintain an effective health & safety management system a Health & Safety Committee has been set up whose members actively participate in attaining the goal of zero harm. Regular quarterly meetings of

the Health & Safety Committee are conducted to maintain compliance with legal requirements. An example of a preventive measure the company has taken is the arrangement of eye washing facility to provide first aid treatment to an employee if injured from chemical handling.

Training of employees is an effective tool to ensure occupational health and safety. DBPL continuously develops and executes an extensive training plan which includes training topics on employee health and safety, frequency of training, training materials, trainer details etc. According to the training plan around 200 trainings on average are being provided every year and 90% of total manpower received these trainings. The trainings are conducted by the training department, which is a part of the Human Resources Development division.



- III. **SA8000 Certification:** DBPL obtained the SA8000 certification in August 2012, the global standard providing a framework to certified organizations to demonstrate their dedication to the fair treatment of workers. As of now it is one of only six organizations in Bangladesh to obtain and maintain the SA8000 certification.

In 2017, DBPL transitioned to the 2014 version of SA 8000, which is the latest edition of the standard. As a part of its ongoing activities for compliance to SA8000 standards, DBPL has newly formed a Social Performance Team (SPT), by electing nine workers and three management representatives.

The SPT members participate in risk assessments, monitoring, and facilitating the implementation of corrective and preventive actions. The worker representatives facilitate communication between workers and management on recommendations or complaints relating to SA8000 policy implementation and in general participate in the following actions:

- Risk assessment
- Internal audits and monitoring
- Relevant and appropriate aspects of management review
- Opening and closing meetings of labor audits, including SA8000 audits
- Reporting back to workers on any corrective and preventive actions taken
- Reporting back to Senior Management on the performance and benefits of actions taken to meet the SA8000 Standard

The management members of the Social Performance Team participate in management reviews and the decision-making process to implement preventive and/or corrective actions.

As part of complying with the standards of SA8000, DBPL through the assistance of SPT, has newly developed two additional comprehensive risk assessments, which are followed to ensure health and safety at workplace:

- a) Risk assessment for new and expectant mothers
- b) Risk assessment for construction workers.

IV. [Counseling & Discipline Policy:](#) DBPL has a defined disciplinary process, which is explained to all employees in new employee orientation and is defined in the employee handbook. The company does not and will not engage in or support the use of corporal punishment, mental or physical coercion, or verbal abuse.

V. [Remuneration:](#) DBPL recognizes the right of employees to a living wage, ensuring wages paid meet or exceed the legal minimum standard and are sufficient for basic needs of a person while providing some discretionary income on top. All overtime is reimbursed at a premium rate as defined by national law.

The company does not use labor-only contracting arrangements, consecutive short-term contracts and/or false apprenticeship schemes to avoid fulfilling its obligations to the employees under applicable labor and social security regulations. In 2017, DBPL has made an average salary increase of 12% as a result of the annual performance review.

Furthermore, DBPL has additionally implemented a policy, whereby after 6 months of continued employment, every employee enjoys an increase of 10% in gross wage.

VI. [Health Care Benefits:](#) DBPL provides health care benefits and medical facilities for all employees. A qualified and registered physician, a paramedic and two nurses are available during working hours for medical need or emergency of the workers. All expenses for the treatment of work

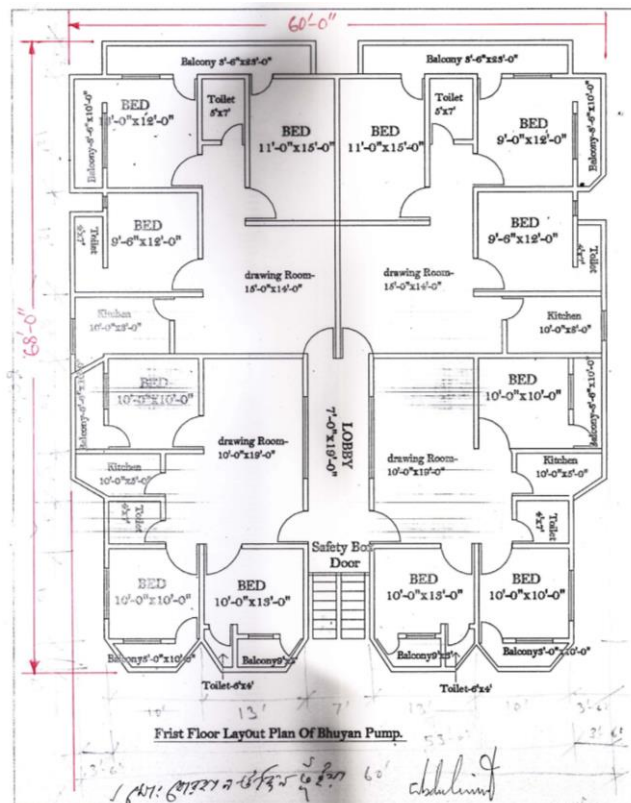
related injury are borne by the company.

The company has an agreement with Edison Health Care Ltd. to provide health care facilities to the employees free of cost. The following benefits are available to the staff under the scheme:

- Annual Health Checkup.
- Maintain data base of the employees' health.
- Free services of a Health Assistant based at factory.
- Free consultation by doctors of empanelled hospitals.
- Discount on tests and hospitalization in empanelled hospitals.
- Hospitalization insurance for expenses up to BDT 20,000.
- Life insurance up to BDT 20,000.

VII. **Group Insurance:** Employees are provided group insurance arranged at company's cost. DBPL has an agreement with global insurance company Metlife for this purpose.

VIII. **Housing Facilities:** Dormitory facilities are available for the employees of DBPL. Within the factory compound there is a ladies' dormitory. In addition there are three rented housing facilities for men within walking distance from the factory. Recently two more floors at an outside dormitory, have been added on rental basis to accommodate an additional 88 persons. The dormitory is equipped with all modern facilities. The floor plan for the new floors is given below:



- IX. Regular Recreational Activities & Celebration:** DBPL arranges recreational activities for its employees such as games and tournaments, and celebration program for various national & international days on humanitarian ground like Victory Day, Bengali New Year, International Mother Language day etc. Moreover, Picnic is arranged annually for the whole family of all employees of Dutch-Bangla Pack Ltd. This year's picnic was arranged on 20 February 2017 at Meghna Village resort. A total of 1107 persons including DBPL staff and their family members participated in the event. The total cost of one million BDT for organizing the program was borne by the company.



Employees & family members at DBPL picnic

Measurement of Outcomes:

- Ø SA 8000 certificate for Social Accountability.
- Ø Dutch-Bangla Pack Ltd. has been identified as an example factory in Bangladesh by the Dutch minister for foreign trade and development cooperation.
- Ø Suggestion box is available.
- Ø Regular awareness session on the principles of SA 8000, Workplace safety, Behavior Based Safety.
- Ø Worker's participatory profit fund.
- Ø Allowances for attendance, proper hygiene practices, night shifts etc.
- Ø The appointment letter has been updated by incorporating all additional points what is necessary according to the local labor law.

Labor Principles

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 labor.

Principle 5:

The effective abolition of child labor.

Principle 6:

The elimination of discrimination in respect of employment and occupation

Assessment, policy and goals: DBPL is committed to responsible business practices with absolute regard for conventions of the ILO, UN and national law related with Labor. We uphold the commitment not only for our core business but also for our suppliers and vendors as well.

Implementation:

Freedom of Association and Right to Collective Bargaining (Principle-3): All workers have the right to form, join, and organize trade unions of their choice and to bargain collectively on their behalf with the company. Dutch-Bangla Pack Ltd respects this right, and effectively informs personnel that they are free to join an organization of their choosing and that their doing so will not result in any negative consequences to them, or retaliation, from the company. Furthermore, the company shall not interfere with the establishment, operation and organization of collective bargaining groups.

As a part of its ongoing activities for compliance to SA8000 standards, DBPL has formed a Social Performance Team (SPT), by electing nine worker and three management representatives.

The SPT members participate in risk assessments, monitoring, and facilitating the implementation of corrective and preventive actions. The worker representatives facilitate communication between workers and management on recommendations or complaints relating to SA8000 policy implementation and in general participate in the following actions:

- Risk assessment
- Internal audits and monitoring
- Relevant and appropriate aspects of management review
- Opening and closing meetings of labor audits, including SA8000 audits
- Reporting back to workers on any corrective and preventive actions taken
- Reporting back to Senior Management on the performance and benefits of actions taken to meet the SA8000 Standard

The management members of the Social Performance Team participate in management reviews and the decision-making process to implement preventive and/or corrective actions.

Elimination of Forced & Compulsory Labor (Principle-4): Dutch-Bangla Pack Ltd. shall not engage in or support the use of forced or compulsory labor as defined in ILO Convention 29, nor shall personnel be required to pay “deposits” or lodge “identification papers” with the company upon commencing employment. We don’t withhold any part of any personnel’s salary, benefits, property, or documents in order to force such personnel to continue working for the company. Personnel employed by the company shall have the right to leave the workplace premises after completing the standard workday, and be free to terminate their employment provided that they give reasonable notice. Workers are allowed to leave after their regular shift. They are not forced to remain at the work premises to work overtime hours – therefore all overtime work must be fully voluntary & paid at a premium rate.

Abolition of Child Labor (Principle-5): Dutch-Bangla Pack Ltd. shall not engage in child labor at any level of the organization. No worker is employed under the minimum age established by national law (Labor Law 2006). In any event children under the age of fourteen (14), or the minimum working age according to International Labor Organization (ILO) exemptions (under Convention 138), shall not be recruited or employed.

According to the *Company Policy* of Dutch-Bangla Pack Ltd., employment age is at least **18** years. To eliminate incidences of child labor at Dutch-Bangla Pack Ltd., we subscribe to the appropriate national and international legal standards, and also adopt some objectives at the time of recruitment of employees.

Elimination of discrimination (Principle-6): We have a well-defined & established policy for non-discrimination. DBPL does not engage in or support any type of discriminating practices, or harassment in any form to occur. It asks only skills oriented questions when interviewing for hire or promotion. DBPL 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. DBPL does not allow behavior from its employees that are discriminative or harassing in nature. Gestures, language and physical contact that are sexually coercive, threatening, abusive, or exploitive are prohibited. Employees are informed of this policy during new employee orientation and it is covered in the employee handbook. All allegations of discrimination or harassment are brought immediately to the attention of the Human Resources Department and are investigated immediately & resolved.

Measurement of Outcomes:

- Ø SA 8000 Certificate for Social Accountability.
- Ø Dutch-Bangla Pack Ltd. has been identified as an example factory in Bangladesh by the Dutch minister for foreign trade and development cooperation.
- Ø Formation & Activity of “Social Performance Team”.
- Ø No labor strike or any kind of unrest ever.
- Ø Number of child worker is ZERO.
- Ø Defined procedure for grievance management.
- Ø Periodic Internal & External Audit. Already total 03 nos. of Internal & 05 nos. of External audit conducted till to date in 2017.
- Ø Yearly reporting to the mother company LC Packaging Ltd. Netherland, about the compliance status of its standards.

Environmental Principles

Principle 7:

Businesses should support a precautionary approach to environmental challenges.

Principle 8:

Undertake initiatives to promote greater environmental responsibility.

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Assessment, policy and goals: DBPL is committed to prevent environmental pollution & continually improve the environment management system. DBPL recognizes that the delivery of its operations inevitably impact on the environment in a number of ways, for example, through the generation of waste through the production process and the use of energy for heating and lighting. Through a commitment to continuous environmental improvement, DBPL's aim is to ensure that our business operation is undertaken in such a manner as to have minimum impact on the environment. Specifically, DBPL strives to minimize environmental aspects by decreasing wastes, using optimum energy, using non-hazardous chemicals instead of hazardous chemicals, produce eco-friendly products that can be recycled and reused, seek continuous improvement in the design and implementation of products and processes, to eliminate or minimize probable health hazards, incident risks and minimize environmental aspects by using new technologies. The basic raw material of DBPL is Polypropylene which is a polyolefin thermoplastic. Generally, polyolefin are recyclable through a re-extrusion and granulation process. Furthermore, DBPL also remains prepared for emergencies and act promptly to eliminate their resulting impacts.

Implementation: DBPL undertook various measures to achieve reductions in waste management. One such measure is proper segregation of waste products. Waste management principles require separate storage and consequent disposal of waste material at every step of the production process. An intensive training program has been accustomed to make the employees aware of waste management principles. Regular monitoring also undertaken to confirm that employees are not deviating from established rules and regulations. Currently, wastage materials are only placed in designated waste containers, which are collected at a designated frequency and stored in a separate warehouse. Later, this waste is recycled through an external recycler.

Furthermore, to promote energy efficiency, DBPL has installed solar panels on its roofing, which is used for internal heating. DBPL has also arranged for several energy audits which attempted to identify scopes for reducing energy consumption without compromising working environment comfort and safety. Based on the feedback of the energy audit, DBPL implemented specific steps, such as converting older T12 fluorescent fixtures to high efficiency T5 or T8 fixtures, daylight harvesting etc. DBPL has also installed water absorption chillers that shall reduce energy requirements for air conditioning significantly.



To effectively control the use of hazardous substances, DBPL firstly identifies all hazardous substances that are required for the production process. An initial evaluation is done to ascertain whether any of these substances can be replaced with less harmful alternatives. Consequently, attempts are made to mitigate the risks of contamination and exposure through these hazardous materials by implementing precautionary measures such as

secondary containers, encased and designated storage, minimizing storage of hazardous chemicals that are susceptible to human contact etc.

Air Quality Test: DBPL carries out Air Quality Tests to check the level of pollution and also to comply with the environment protection laws of Bangladesh. The tests are conducted at two places where there is risk of pollution: a) Ambient air quality in factory premise outside of production building and b) Stack emission of gas generator. In both places the results received indicate that the air quality is well within the permissible limit.

Expansion Project: Dutch-Bangla Pack Ltd. (DBPL) has undertaken an expansion in its land adjacent to the current factory buildings. The planned expansion will add 4000 square meter of space and increase the

company's capacity by 50%. The estimated development cost of Euro 6.5 million is being financed by FMO - the Dutch Development Bank and Prime Bank of Bangladesh.

The new facility will manufacture bags and packaging materials for food, pharmaceutical and high-end chemical industries. To maintain the quality and high standard, equipment of European origin will be installed for production. The expansion work will commence in September 2017 and will be completed by August 2018.



Waste Recycling Project: Dutch-Bangla Pack Ltd. (DBPL) is setting up a state-of-the-art commercially driven recycling and plastic waste management company named “GreenBANGLA Recycling” which will apply latest technology and responsible management practices. The business model will be to buy used plastic from local and international sources and then recycle and process the plastics into value-added products.

Recycling plastic from plastic waste is a growing business worldwide. Bangladesh does not have a polymer manufacturing industry and the virgin PP used in the production of plastic goods is all imported. As such, there is a rapidly growing incentive to recycle plastic waste, which is vital if we consider environmental sustainability.

Total demand for plastic granulates in Bangladesh stands at more than 1 million ton per annum. Out of the total demand, only 40 % of the resin used is virgin material and the remainder is recycled resin (source: Waste Concern Bangladesh). The recycled resin is produced in poor recycling facilities, which determine the quality of the re-granulate and hence limits its usage in high value added, export oriented industries (such as big bags or woven PP bags). Though a growing portion of plastic waste is recycled, health safety and environmental issues are not properly looked after. Rampant use of child labor, especially for waste collection and sorting, leads to violations of national and international labor standards.

The GreenBANGLA Recycling Company will be set up with a goal to address the above needs. To maintain the social, environmental and commercial sustainability of the company, staff and waste pickers will be trained, exposure to health risks will be reduced and livelihood opportunities will be increased. The recycling company will apply to SA8000, ISO14000 and OHSAS18000 certification in order to ensure long term commitments to social, environmental, health and safety standards.



Visit of H.E. the Netherlands Ambassador to Dutch-Bangla Pack Ltd. Factory: On the 29th of August, 2017 the Ambassador of the Netherlands to Bangladesh, Her Excellency Ms. Leoni Cuelenaere visited the production facilities of Dutch-Bangla Pack Ltd. (DBPL), the leading manufacturer of Flexible Intermediate Bulk Containers (FIBCs) or Big Bags in Bangladesh. A joint-venture between Dutch and Bangladeshi partners, the DBPL factory is situated in Gazaria, Munshiganj. The Dutch Ambassador laid the foundation stone for an expansion project of the production facilities and visited a newly built recycling and plastic waste management plant. Ambassador Cuelenaere conveyed her profound appreciation for the environment and worker friendly joint venture which understands so well what “People, Planet, Profit” means. Ms. Monnujan Khanam, a Senior Adviser from the Netherlands Embassy and Members of the Board of Directors, high officials and employees of Dutch-Bangla Pack Ltd. were present during the event.

Measurement of Outcomes:

- Ø Certificate of ISO 14001:2004 for Environment Management System.
- Ø List of Environmental aspect-impact and control the significant impact.
- Ø Achievement of the objectives of Environment management system.
- Ø NOC from the Environment department of Bangladesh.
- Ø Periodic internal & External Audit. Already total 03 nos. of Internal & 05 nos. of External audit conducted till to date.
- Ø Dutch-Bangla Pack Ltd. has been identified as an example factory in Bangladesh by the Dutch minister for foreign trade and development cooperation.
- Ø DBPL has instituted a waste recycling project at an investment of USD 600,000 to ensure safe, sustainable and commercially-viable recycling of plastic waste. The project shall not only recycle the plastic waste generated by DBPL, but also invigorate others to follow suit by acting as a pilot project. This project is also subsidized by DEG (German Development Finance).

Anti-Corruption Principles

Principle 10:

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

Assessment, policy and goals: DBPL takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our business in an honest and ethical manner. The company has adopted this policy to communicate the message of zero-tolerance and assist those working for us to uphold it.

Implementation: DBPL is committed to conduct all of its business in an honest and ethical manner and ensure that it meets its legal obligations and averts, notices and eradicates corrupt practices, and collaborates to reduce opportunities for bribery and corruption. DBPL requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. DBPL does not tolerate any form of corruption and takes the most serious view of any attempt to commit corrupt practices by members of staff, contractors, agents and business partners. Cases of suspected corruption are to be properly investigated and appropriate action taken, including reporting to the appropriate authorities, disciplinary action, prosecution and active pursuit of recovery.

EcoVadis: In 2017, along with LC Packaging, DBPL was awarded the prestigious EcoVadis Silver CSR Rating. EcoVadis is an international organization that monitors and provides CSR and sustainability ratings for organizations across the supply chain. Integrating Process, People and Platform the criteria used by EcoVadis for evaluating companies include Ethical, Environmental, Social and Supply Chain functions. The ethical functions focus on the following aspects while measuring the performance standard of a company

- Corruption & bribery
- Anti-competitive practices
- Fair marketing



Measurement of Outcomes:

- Ø DBPL has not been involved in any legal cases, rulings or other events related to corruption and bribery.
- Ø DBPL has very close relationship with the Dutch Embassy in Dhaka for mentoring and advisory role in the proceeding and rules.
- Ø Every year, bi-annual internal audits take place.
- Ø Our books and accounts are subjected to statutory external audit annually.
- Ø A new accounting software, Tally ERP-9 Gold (Multi) User Edition has been implemented to ensure strict legal adherence.
- Ø Anti-money laundering policy has been developed on 20 January 2016.





Implementing the Ten Principles into Strategies & Operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units

The following best practices are implemented in DBPL, which:

- ∅ allocates responsibility for implementing sustainable practices in corporate functions like procurement, government affairs, human resources etc. to ensure seamless integration with company's sustainability goals and commitments
- ∅ aligns goals, strategies and incentive schemes of all units and subsidiaries of the company with corporate sustainability strategy
- ∅ assigns responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary

Criterion 2: The COP describes value chain implementation

The following best practices are implemented in DBPL, which:

- ∅ evaluates the entire value chain, both upstream and downstream, to highlight the opportunities, risks and impacts
- ∅ shares policies and expectations with suppliers and relevant business partners
- ∅ carries out capacity building activities like training and awareness-raising events for suppliers and other business partners
- ∅ employs monitoring and assurance mechanisms like audits and screenings to ensure compliance within the company's sphere of influence

Criterion 3: The COP describes robust *commitments, strategies or policies* in the area of human rights

The following best practices are implemented in DBPL, which:

- ∅ is pledged to conform, wherever the company operates, to all applicable laws and globally recognized human rights principles e.g. the Universal Declaration of Human Rights and Guiding Principles on Human Rights
- ∅ has integrated or stand-alone policy declaring commitment to support and respect human rights approved at the company's most senior level (BRE 1 + BRE5 + ARE 1 + ARE 5)
- ∅ has policy statement informing human rights expectations from staff, business partners and others linked to products, operations and services (BRE 1)
- ∅ has publically available policy statements, communicated internally and externally to all staff, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)

Criterion 4: The COP describes effective *management systems* to integrate the human rights principles

The following best practices are implemented in DBPL, which:

- ∅ has procedures to conform to globally recognized human rights principles
- ∅ implements a continuous due diligence process to assess the actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)
- ∅ conducts internal training and awareness-raising events on human rights for management and staff
- ∅ employs operational grievance mechanisms for anyone potentially impacted by the company's activities (BRE 4 + ARE 4)
- ∅ assigns responsibility and accountability for addressing human rights impacts
- ∅ utilizes decision-making, budget and oversight to effectively respond to human rights impacts
- ∅ employs procedures for the remediation of adverse human rights impacts caused or contributed to by company (BRE 3+ BRE 4 + ARE3 + ARE 4)

Criterion 5: The COP describes effective *monitoring and evaluation mechanisms* of human rights integration

The following best practices are implemented in DBPL, which:

- ∅ applies a system to monitor, by quantitative and qualitative metrics, the effectiveness of human rights policies and implementation, including in the supply chain (BRE3 + ARE3)
- ∅ employs a system of monitoring that utilizes internal and external feedback, including from affected stakeholders
- ∅ has functional procedures to deal with incidents caused or contributed to by the company and affecting internal and external stakeholders (BRE 4 + ARE 4)
- ∅ carries out leadership reviews for monitoring and enhancement of results
- ∅ implements grievance procedures that are legitimate, equitable, predictable, accessible, transparent, rights-compatible, a source of continuous learning, and based on dialogue and engagement (BRE4 + ARE4)

Criterion 6: The COP describes robust *commitments, strategies or policies* in the area of labor

The following best practices are implemented in DBPL, which:

- ∅ refers to the principles of applicable international labor standards (ILO Conventions) and other normative international instruments in company policies
- ∅ performs on-going reviews of relevance of the company's labor principles
- ∅ maintains written company policy to follow the national labor law and conform to relevant international labor standards in worldwide operations, and engage in dialogue with representative worker organizations (international, sectoral and national).
- ∅ refers to relevant international labor standards in the contracts with suppliers and business partners
- ∅ maintains specific commitments and HR policies in line with national development priorities or decent work priorities in the country of operation

- ∅ maintains structural engagement with a global union, via a Global Framework Agreement

Criterion 7: The COP describes effective *management systems* to integrate the labor principles

The following best practices are implemented in DBPL, which:

- ∅ performs regular risk and impact assessments in connection with labor functions
- ∅ conducts regular dialogue with trade unions to review the company's progress in maintaining labor standards
- ∅ assigns accountability to the relevant staff to ensure compliance to labor principles
- ∅ conducts awareness building events and internal training on labor principles for company management and employees
- ∅ engages in active dialogue with suppliers to address labor-related challenges
- ∅ maintains grievance management system, communication channels and other procedures (e.g., whistleblower mechanisms) for workers to voice concerns, offer suggestions and seek advice

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labor principles integration

The following best practices are implemented in DBPL, which:

- ∅ maintains a system to track and measure performance based on standardized performance metrics
- ∅ conducts regular communication with worker representative committees and organizations to review progress and jointly identify future priorities
- ∅ conducts audits and other measures to evaluate and improve the working conditions of companies in the supply chain, in agreement to global labor standards
- ∅ employs procedures to engage with suppliers to address challenges (i.e., partnership approach instead of corrective approach) to improve workplace practices

Criterion 9: The COP describes robust *commitments, strategies or policies* in the area of environmental stewardship

The following best practices are implemented in DBPL, which:

- ∅ adheres to pertinent international conventions and instruments for maintaining environmental standards
- ∅ highlights the importance of environmental stewardship of the company
- ∅ maintains a written policy for environmental stewardship
- ∅ conforms to minimum environmental standards in contracts with suppliers and relevant business partners
- ∅ maintains specific goals and commitments for specified years

Criterion 10: The COP describes effective *management systems* to integrate the environmental principles

The following best practices are implemented in DBPL, which:

- Ø performs environmental risk and impact assessments on a regular basis
- Ø assigns responsibility and accountability within the company for conforming to environmental principles
- Ø conducts training and awareness building events on environmental stewardship for management and employees
- Ø employs a grievance management system, channels of communication and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts

Criterion 11: The COP describes effective *monitoring and evaluation mechanisms* for environmental stewardship

The following best practices are implemented in DBPL, which:

- Ø employs a system to track and measure performance based on standardized performance metrics
- Ø performs leadership reviews for monitoring and improvement of results
- Ø maintains procedures to deal with specific incidences
- Ø undertakes audits and other measures to monitor and improve the environmental performance of companies in the supply chain

Criterion 12: The COP describes robust *commitments, strategies or policies* in the area of anti-corruption

The following best practices are implemented in DBPL, which:

- Ø maintains publically stated formal policy of zero-tolerance of corruption (D1)
- Ø maintains strong commitment for compliance with relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes(B2)
- Ø maintains and implements detailed policies for high-risk areas of corruption (D4)
- Ø has policy on anti-corruption regarding business partners (D5)

Criterion 13: The COP describes effective *management systems* to integrate the anti-corruption principle

The following best practices are implemented in DBPL, which:

- Ø supports by the organization's leadership for anti-corruption (B4)
- Ø carried out risk assessment of potential areas of corruption (D3)
- Ø has human resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)
- Ø arranges internal checks and balances to ensure consistency with the anti-corruption commitment (B6)
- Ø establishes management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)
- Ø has internal accounting and auditing procedures related to anticorruption (D10)

Criterion 14: The COP describes effective *monitoring and evaluation mechanisms* for the integration of anti-corruption

The following best practices are implemented in DBPL, which:

- Ø conducts Leadership review of monitoring and improvement results (D12)
- Ø has process to deal with incidents (D13)

Criterion 15: The COP describes core business contributions to *UN goals and issues*

The following best practices are implemented in DBPL, which:

- Ø aligns core business strategy with one or more relevant UN goals/issues
- Ø develops relevant products and services or design business models that contribute to UN goals/issues
- Ø adopts and modify operating procedures to maximize contribution to UN goals/issues



Criterion 16: The COP describes strategic social investments and philanthropy

The following best practices are implemented in DBPL, which:

- Ø pursues social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy
- Ø coordinates efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors

Criterion 17: The COP describes advocacy and public policy engagement

The following best practices are implemented in DBPL, which:

- Ø publicly advocates the importance of action in relation to one or more UN goals/issues
- Ø commits company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues

Criterion 18: The COP describes partnerships and collective action

The following best practices are implemented in DBPL, which:

- Ø develops and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy
- Ø joins industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain

Criterion 19: The COP describes CEO commitment and leadership

The following best practices are implemented in DBPL:

- Ø CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact
- Ø CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards
- Ø CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation
- Ø which makes sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team.



Criterion 20: The COP describes Board adoption and oversight

The following best practices are implemented in DBPL:

- Ø Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance
- Ø Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
- Ø Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)

Criterion 21: The COP describes stakeholder engagement

The following best practices are implemented in DBPL, which:

- Ø publicly recognizes responsibility for the company's impacts on internal and external stakeholders
- Ø defines sustainability strategies, goals and policies in consultation with key stakeholders
- Ø consults stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance
- Ø establishes channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'



About LC Packaging

Dutch-Bangla Pack Ltd. is an equal joint-venture with LC Packaging of Netherlands.

LC Packaging is a family business, that has been active in the packaging industry since 1923 and for four generations. LC Packaging is a distributor and producer of packaging with its own production facilities in Europe, Asia and Africa. A multinational with over 1.000 employees, with office in 16 countries (HQ in The Netherlands) and a turnover of € 157 million in 2015. The company believes in long-term relationships with customers, production partners and of course its own employees, as they are LC's most valuable asset. The packaging expert is working hard to deliver quality. To LC 'quality' is not just the strength and usability of the final product: it is also in the working conditions and the working environment. It is about creating a safe, healthy and pleasant workplace for its workers, about the payment of a fair wage, rewards, recognition and trust. These quality requirements, and thus the commitment to 'people, profit and planet' applies to all LC offices and product locations and on LC's production partners. Quality is monitored at all levels by a dedicated Quality Department and is confirmed by the Dutch minister of foreign trade and development cooperation, who set's LC (and DBPL in particular) as an example, and the extensive portfolio of certificates that has been awarded to the LC Group, including the SA 8000 and EcoVadis certificate.

More information about the [LC Packaging CSR policy](#)

Take a look at the [LC Packaging CSR Brochure](#)