



GLOBAL COMPACT COMMUNICATION ON PROGRESS

Bulleh Shah Packaging (Private) Limited
[A Packages Group Company]
Period: Jan 2018 to Dec 2018

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1 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.

1.1 Assessment, Policy and Goals

Bulleh Shah Packing (BSP) is committed to educate its employees, suppliers, business partners and other stakeholders to acknowledge and respect the Universal Declaration of Human Rights. Our Code of Conduct (CoC) is built on our core values in which human rights are essential. To further steer our human rights work we have policies on anti-discrimination, gender, human resources and whistleblowing. We have also incorporated basic human rights in our Suppliers Sustainability Requirements (SSR).

BSP is active in a challenging human rights environment and we strive to set a good example of how to protect human rights in this environment. We will continue to assess and improve our work on human rights.

1.2 Implementation

The responsibility for human rights lies with the Sustainability Department and the Human Resources Department. BSP has certain procedures to implement human rights within its area of influence, these include:

- All employees and workers must commit to the CoC by signing a "Responsibility Pledge" in order to maintain employment at BSP.
- A comprehensive CoC document is shared on BSP's internal intranet portal.
- A summary of the CoC (printed as a pocket guide) is handed over to each employee as a part of BSP's commitment to make sure its CoC is communicated to the workforce.
- BSPs hosts awareness sessions and trainings to raise awareness on human rights, environment, fair business practices, and compliances with the law.
- Stakeholder engagement activities is conducted with the local community as well as supply chain communities to follow up on the risks and impacts of BSPs operations.

- BSP has established internal as well as external whistleblowing procedures and grievance mechanisms to make sure BSP is informed of misconduct.
- BSP has a well devised vendors training and assessment system with dedicated team to promote that our supply chain follows the same Human Rights Standards as Bulleh Shah Packaging.

1.3 Measurement of outcomes

Human rights are continually audited by the internal audit team, supply chain auditors and external auditors and researchers.

- BSP conducted 45 supply chain audits during 2018.
- BSP has also engaged third party, which has conducted 19 audits in 2018.
- BSP hosted more than 15 awareness sessions on its Ethics and Compliance Platform which include human rights in 2018.
- BSP also hosted number of awareness sessions on human rights and provided free of cost health facilities to the communities nearby in 2018.
- BSP runs six schools in supply chain communities to guarantee the right to education.
- BSP supports schools in its proximity to guarantee the right to education.
- BSP runs a Mother and Child Health Clinic to support the right to healthcare for local communities.
- BSP operates a Mobile medical unit Sehat Mobile to provide primary healthcare facilities at the door step of the under privileged areas. This program is fully operational and is serving the supply chain communities of BSP and other underprivileged communities.

2 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

2.1 Assessment, Policy and Goals

BSP respects and supports to ILO core conventions and UNGC principles on labour standard and incorporates them in policies and guidelines. BSPs HR policy includes rights of workers and equal rights. 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 demand that our suppliers also respect the core ILO conventions in the SSR.

BSP comply with the labour laws of Pakistan and the related international laws and standards and do not tolerate any form of discrimination at the workplace.

2.2 Implementation

The responsibility for labour rights lies with the human resources department and the sustainability department. BSP has certain procedures to implement labour rights within its area of influence, these include:

- All employees and workers must commit to the CoC by signing a "Responsibility Pledge" in order to maintain employment at BSP.
- BSPs hosts awareness sessions and trainings to raise awareness on labour rights, environment, fair business practices, and compliance with the applicable laws.
- BSP respects the unions and are in constant dialogue with them to improve working conditions
- Occupational Health & Safety (OHS) management systems establish and maintain a working environment free of health risks

- BSP has a whistle blowing mechanism to help identify behavior that's not in accordance with the CoC and other policies.
- BSP has been verified by SEDEX (Supplier Ethical Data Exchange) for continual improvements in its ethical and responsible business practices.

2.3 Measurement of outcomes

Labour rights are continually audited by the internal audit team, supply chain auditors and external auditors and researchers.

- BSP conducted 45 supply chain audits during 2018.
- BSP hosted more than 15 awareness sessions on its Ethics and Compliance platform which include labour rights.
- BSP in cooperation with ILO conducted a decent work deficit research program in the paper and board supply chain.
- BSP has a women's platform ACTS (actively caring through sharing) to educate and groom its female employees through mentorship, which is also extended to other sister concerns of BSP.

3 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.

3.1 Assessment, Policy and Goals

Caring for the environment is part of the BSP CoC and an integrated part in our operation. Impact assessments has been done as part of the EIA. At BSP we recognize our impact on the environment and mitigate environmental risks and impacts. We work closely with our suppliers and demand environmental responsibility from them in the SSR.

3.2 Implementation

BSP is implementing its environmental goals using a broad spectrum of activities and policies.

- Caring for the environment is integrated in BSPs CoC
- BSP hosted more than 15 awareness sessions on its Ethics and Compliance platform which include environmental awareness.
- BSP runs a Environmental Management systems (EMS) to minimize waste, optimize the use of energy and materials, and ensure eco-friendly waste processing
- BSP conducted trainings of ISO 50001 Energy Management System and intends to take its processes a step further towards conservation of resources.

3.3 Measurement of outcomes

Certifications and compliances:

- ISO:14001certified
- ISO 50001 Trainings
- FSC COC - Forest Stewardship Council Chain of Custody

4 Anti-corruption

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

4.1 Assessment, Policy and Goals

BSP has zero tolerance policy on corruption and bribery and always act in accordance with Pakistani law. BSP has identified potential risk areas and made SOPs on how to deal the with government, private individuals and corporations in an anticorruption context. In the SSR we also demand a zero corruption policy from our suppliers.

4.2 Implementation

BSP is implementing its anti-corruption through a number of activities. These include:

- BSP hosted more than 15 awareness sessions on its Ethics and Compliance Platform which include anti-corruption awareness.
- BSP implement a whistle blowing procedure with the ability to be anonymous.
- BSP has established a ethics compliance committee to support corruption investigations

4.3 Measurement of outcomes

Anti-corruption and Bribery Policy compliance is verified through internal audits by the compliance investigation team and dealt with in accordance with the severity of the case. Records are kept on whistle blowing cases to measure effectiveness over time.