



# **LABOR AND HUMAN RIGHT POLICY**

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Company Name: Apackaging Group LLC

Effective Date: 01. October. 2023

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Revision: 01

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## INTRODUCTION

At A Packaging Group, we recognize the intrinsic value and dignity of every individual within our workforce and the broader global community. Our commitment to labor and human rights is paramount in all aspects of our operations, reflecting our core values of integrity, responsibility, and respect.

As a global leader in the cosmetic and beauty packaging industry, we understand the significant impact our actions can have on the lives of employees, suppliers, and stakeholders worldwide. Therefore, this policy serves as a steadfast declaration of our dedication to upholding fundamental labor standards, promoting fair employment practices, and safeguarding human rights across our supply chain. Through proactive measures, continuous improvement, and transparent communication, we strive to foster a culture of inclusivity, equity, and empowerment for all.

## SCOPE

This comprehensive policy applies to all Packaging Group sites globally, encompassing all employees, contractors, subcontractors, and all stakeholders aligned with us.

Sr. No.	Site	Address
1.	California, USA	1350 Mountain View Circle 91702 Azusa, CA United States of America
2.	Defiance, Ohio	25925 Commerce Drive, Defiance, OH 43512

## POLICY STATEMENT

At A Packaging Group, we prioritize the dignity, safety, and fair treatment of our employees worldwide. Our labor and human rights policy is committed to upholding international standards, ensuring equal opportunities, promoting diversity, and fostering a culture of respect and inclusion in every aspect of our operations.

## PRIMARY FOCAL AREA

### 1. Employee Health and Safety:

- Ergonomic Workstations Sentence: Ensure ergonomic workstations to prevent repetitive strain injuries and promote employee comfort during packaging tasks in the cosmetic manufacturing process.
- Label: Hazardous Substance Handling Sentence: Implement strict protocols for



handling hazardous substances to safeguard employee health and prevent exposure risks in cosmetic packaging production.

- **Label: Equipment Safety Checks Sentence:** Regularly conduct equipment safety checks to mitigate potential risks associated with machinery operation in cosmetic packaging manufacturing facilities.

## **2. Working Condition:**

- **Work-Life Balance:** Ensuring employees in cosmetic packaging manufacturing maintain a healthy balance between professional responsibilities and personal life to foster well-being.
- **Right to Disconnect:** Upholding the right of employees to disconnect from work-related communications outside of designated working hours to support mental health.
- **Fair Remuneration:** Providing competitive salaries and benefits to cosmetic packaging manufacturing workers commensurate with their skills, experience, and industry standards.

## **3. Labor Relation**

- **Employee Representation:** Ensure active involvement of workers in decision-making processes regarding labor rights and conditions within our cosmetic packaging manufacturing facilities.
- **Collective Bargaining:** Facilitate negotiations between management and employee representatives to establish fair wages, benefits, and working conditions in our cosmetic packaging production sites.
- **Transparent Communication:** Foster open dialogue between management and employees to address concerns and promote a harmonious workplace culture within our cosmetic packaging manufacturing plants.

## **4. Career Management**

- **Recruitment:** Implement inclusive hiring practices to attract diverse talent, fostering innovation and creativity in cosmetic packaging manufacturing.
- **Evaluation:** Establish transparent performance criteria ensuring fair assessments for career advancement and skill development in the beauty packaging industry.
- **Layoff Management:** Develop compassionate protocols prioritizing support and retraining initiatives for affected employees during workforce adjustments in beauty packaging production.

## **5. Child and Forced Labor**

- Supply chain audit: Regularly assess suppliers to ensure zero tolerance for child or forced labor in the production of our cosmetic packaging materials.
- Supplier contracts: Require suppliers to adhere to strict anti-child and forced labor policies, backed by contractual agreements and regular compliance checks.
- Community engagement: Collaborate with local communities to promote education and economic opportunities, mitigating the risk of child labor in our supply chain.

## **6. Diversity, Equity and Inclusion**

- Diverse Hiring Practices: Establish inclusive recruitment strategies to attract candidates from diverse backgrounds, ensuring equitable opportunities within the packaging workforce.
- Employee Resource Groups: Form ERGs to provide support and networking opportunities for underrepresented groups, promoting a sense of belonging and inclusion in the workplace.
- Leadership Development: Offer leadership development programs that prioritize diversity and inclusion training for managers and executives, fostering a culture of equity and respect.

## **7. External stakeholder human rights**

- Supply Chain Transparency: Ensure transparency in sourcing materials to prevent human rights violations in the supply chain, including fair labor practices and environmental sustainability.
- Worker Health & Safety: Prioritize the safety and well-being of workers by implementing rigorous safety protocols and providing adequate training and protective equipment.
- Ethical Sourcing: Commit to sourcing raw materials from suppliers who adhere to fair labor practices and respect human rights throughout the supply chain.

## **QUALITY-FOCUSED TARGETS**

### **1. Employee Health and Safety:**

- Ergonomic: Implement ergonomic practices to prevent repetitive strain injuries from tasks like lifting heavy packaging materials, ensuring employee well-being and productivity.

- **Safety Protocol:** Regularly update safety protocols to address evolving risks from new materials and technologies, safeguarding employee health in a dynamic work environment.
- **Trust and Reporting:** Cultivate an environment of trust for employees to freely report safety concerns, fostering a proactive approach to hazard prevention.

## **2. Working Condition:**

- **Flexible Work Arrangements:** Introduce adaptable flexible work schedules to promote a harmonious work-life balance, allowing employees the flexibility to tailor their hours according to personal needs.
- **Disconnection:** Establish policies advocating for the right to disconnect after working hours, prioritizing employee well-being and preventing burnout.
- **Competitive Compensation Packages:** Ensure equitable remuneration packages, aligning with industry standards, to attract and retain top talent within the cosmetics and beauty packaging sector.

## **3. Labor Relations:**

- **Regular Consultations:** Facilitate routine meetings between management and labor representatives to discuss matters such as working conditions, salaries, and benefits, promoting mutual understanding and cooperation.
- **Employee Engagement:** Encourage active employee involvement in decision-making processes related to workplace policies, procedures, and initiatives, fostering a sense of belonging and commitment.
- **Transparent Communication:** Strengthen labor relations through transparent communication channels between management and employees, promptly addressing concerns to maintain a collaborative workplace environment.

## **4. Career Development**

- **Embracing Diversity and Inclusion:** Emphasize diversity and inclusion in recruitment practices to mirror the diverse communities served by the cosmetics and beauty packaging company.
- **Transparent Performance Evaluation:** Institute clear evaluation criteria for unbiased performance assessments, promoting a culture of fairness and meritocracy.
- **Career Growth Opportunities:** Develop comprehensive pathways for career advancement, offering avenues for professional growth and leadership roles within the organization.



## **5. Combatting Child and Forced Labor:**

- **Grievance Mechanism Implementation:** Establish a robust grievance mechanism enabling workers to safely voice concerns regarding potential instances of child and forced labor.
- **Collaborative Supplier Strategy:** Collaborate closely with suppliers to conduct regular audits to ensure compliance with international standards against child and forced labor, fostering transparency and accountability.
- **Transparent Reporting Channels:** Create clear communication channels for employees to report suspicions or instances of child and forced labor, promoting a culture of responsibility and protection.

## **6. Diversity, Equity, and Inclusion:**

- **Inclusive Hiring Policies:** Source talent from diverse pools, advocating for equal opportunities for all, including minorities and marginalized groups, through inclusive hiring practices.
- **Partnerships with Minority-Owned Suppliers:** Foster economic empowerment within underrepresented communities while enhancing product diversity and quality through collaborations with minority-owned suppliers.

## **7. External Stakeholder Engagement:**

- **Safety Measures:** Implement measures to enhance safety for employees and communities, including robust infrastructure and emergency response protocols.
- **Upholding Labor Rights:** Conduct training programs for suppliers to uphold labor rights, ensuring fair wages and safe working conditions across the supply chain.

## **QUANTITATIVE TARGETS**

### **1. Employee Health and Safety:**

- Ensure zero complaints regarding Health and safety by 2030, building from the baseline year of 2023.
- Increase training man-hours on employee health and safety by 25% from 2023 to 2030.
- Implement safety audits quarterly, aiming for a 25% improvement in hazard identification and mitigation by 2030 from 2023 levels.

## **2. Working Condition:**

- Ensure zero complaints about working conditions by 2030, referencing the baseline year of 2023.
- Enhance employee satisfaction by 10% by the end of 2030, from 2023 levels.
- Enhance employee health and wellness programs by 15% by 2030, referencing 2023 initiatives.

## **3. Labor Relation:**

- Increase employee participation in collective bargaining by 15% by 2030 from 2023 baseline.
- Enhance social dialogue platforms with a 20% rise in engagement by 2030 from 2023.
- Achieve 100% compliance with labor relation regulations by 2030, building on 2023 practices.

## **4. Career Management:**

- Increase recruitment of underrepresented groups by 10% by 2030 from baseline year 2023.
- Implement flexible work arrangements, aiming for a 15% uptake by 2030.

## **5. Child and Forced Labor:**

- Reduce attrition by 10% by 2030, compared to the baseline year of 2023.
- Eliminate child labor and forced labor, aiming for 100% compliance by 2030, starting from 2023.
- Implement grievance mechanisms to address forced labor, aiming for zero cases by 2030, from 2023.

## **6. Diversity, Equity and Inclusion:**

- Ensure equal pay for equal work, closing any wage gaps by 2030, from a 2023 baseline.
- Aim for 50% representation in leadership roles by 2030, from the 2023 baseline.

## **7. External Stakeholder Human Rights:**

- Ensure 100% compliance with labor laws and human rights standards by 2030, from 2023 baseline.



## ACTION FRAMEWORK

- **Human Rights & Social Compliance Audits**

APG conducts regular assessments—both internal and third-party—of labor practices across manufacturing sites and supplier operations. These audits identify risks such as forced labor, child labor, fair wages, safe working conditions, and discrimination, enabling corrective action plans as needed.

- **Respectable Working Conditions Commitment**

APG upholds fundamental labor rights in line with ILO standards, ensuring no forced or child labor, freedom of association, fair remuneration, and a respectful work environment free from harassment or discrimination.

- **Training & Capacity Building**

APG provides regular training for employees, HR, and procurement teams on labor rights, ethical practices, and grievance handling. Suppliers and contractors are engaged through workshops to ensure compliance with fair labor standards and APG's Human Rights Policy.

- **Grievance & Reporting Mechanisms**

APG provides accessible channels—including whistleblower and grievance systems—for employees, contractors, or supplier workers to voice concerns or make suggestions safely and confidentially. All reports are investigated promptly with appropriate remediation actions.

## GOVERNANCE & RESPONSIBILITY

- **Human Rights & Compliance Office:**

Oversees the implementation of APG's Labor and Human Rights Policy, ensures compliance with international labor standards (e.g., ILO conventions, UN Guiding Principles), and reports progress to senior leadership.

- **Social Responsibility Task Force:**

A cross-functional team—including HR, procurement, and ESG experts—monitors daily adherence to fair labor practices, ethical sourcing, and workplace safety across all APG operations and supplier networks.

- **Employees & Managers:**

All employees and managers receive annual training on labor rights, workplace diversity, non-discrimination, and grievance procedures. They are encouraged to raise concerns, suggest improvements, and actively contribute to maintaining a respectful and inclusive workplace.

## **REPORTING**

A Packaging Group ensures transparency through rigorous compliance monitoring, accessible grievance mechanisms, and regular disclosures on labor and human rights performance. Collaboration and continuous improvement drive our commitment to uphold standards.

### **1. Compliance Monitoring:**

- A Packaging Group has established a dedicated Compliance Monitoring Team responsible for overseeing adherence to labor and human rights policies and procedures.
- Regular audits and assessments are conducted at manufacturing facilities, subcontractors, and suppliers to ensure compliance with relevant labor laws, international standards, and company policies.
- The Compliance Monitoring Team reviews key performance indicators related to labor and human rights to identify areas for improvement and tracks progress over time.

### **2. Grievance Mechanisms:**

- A Packaging Group provides accessible and effective grievance mechanisms for employees, subcontractors, and other stakeholders to report concerns related to labor and human rights violations.
- An anonymous reporting system has been implemented to encourage individuals to report grievances without fear of reprisal.
- Grievances are investigated promptly, and appropriate actions are taken to address and remediate any violations discovered.

### **3. Transparency and Disclosure:**

- A Packaging Group provides regular and comprehensive reports on its labor and human rights performance to stakeholders, including investors, customers, employees, and the public.

- These reports include information on compliance with relevant regulations and standards, results of audits and assessments, grievance handling procedures and outcomes, as well as efforts undertaken to improve labor and human rights practices.
- Reports are made available through the company website, annual sustainability reports, and other appropriate channels.

#### **4. Collaboration and Engagement:**

- A Packaging Group actively engages with stakeholders, including industry associations, civil society organizations, and government agencies, to promote best practices and address systemic issues related to labor and human rights.
- The company participates in multi-stakeholder initiatives and partnerships aimed at advancing labor rights, such as the United Nations Global Compact and the Ethical Trading Initiative.

### **COMMUNICATION AND TRANSPARENCY**

- The Labor and Human Rights Policy is publicly available on APG's official website and communicated through stakeholder channels, including supplier agreements, corporate social responsibility reports, and internal HR communications.
- Employees are regularly informed of policy updates through training sessions, newsletters, and town hall meetings, with clear expectations to uphold fair labor practices and contribute to a respectful, inclusive workplace.

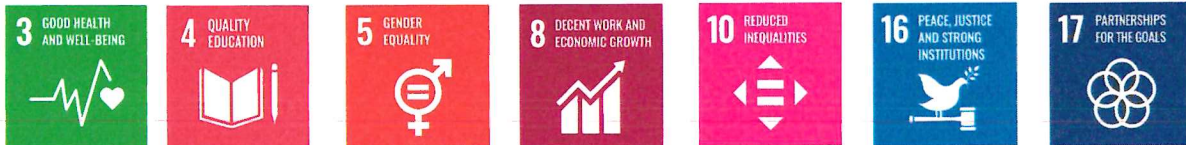
### **CONTINUOUS IMPROVEMENT**

Continuous improvement is foundational to our commitment to labor and human rights within the Packaging Group's cosmetic and beauty packaging industry. Recognizing that ensuring the well-being and fair treatment of our employees is an ongoing process, we undertake regular assessments of our policies, procedures, and workplace conditions. Feedback from employees, stakeholders, and experts in labor and human rights fields informs targeted initiatives aimed at addressing areas for improvement, including employee welfare, diversity and inclusion practices, and adherence to labor laws and international standards.

Furthermore, we invest in training and education programs to empower our workforce and management with the knowledge and skills necessary to uphold and advance labor and human rights principles. Through a culture of continuous improvement, we aim to create a workplace where every individual is respected, valued, and supported in reaching their full potential.



## SDGS (SUSTAINABLE DEVELOPMENT GOALS) COVERED IN THE LABOR AND HUMAN RIGHTS POLICY



### REVIEW MECHANISM

The Human Rights & Compliance Office is responsible for overseeing the implementation and review of this policy. The Labor and Human Rights Policy will be reviewed annually to ensure its effectiveness, alignment with international labor standards, and relevance to APG's operations. Any updates or revisions will be communicated to all stakeholders—including employees, suppliers, and partners—to reflect operational improvements, regulatory changes, or emerging human rights challenges.

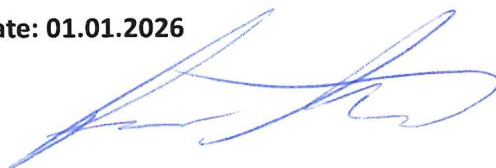
### REVISION HISTORY

Revision No	Date	Description of Change
00	01.10.2023	Initial Release
01	01.01.2025	Updated Revision History, and Included Employee Acknowledgment Form.

Last Review Date: 01.01.2025

Next Review Date: 01.01.2026

Approved By:





## EMPLOYEE ACKNOWLEDGEMENT – APACKAGING GROUP LLC LABOR AND HUMAN RIGHTS POLICY

I acknowledge that I have received, read, and understood the APackaging Group (APG) Labor and Human Rights Policy. I recognize the company's strong commitment to protecting and promoting human rights, ensuring fair labor practices, and fostering a safe, inclusive, and respectful workplace for all employees and partners.

I understand my responsibilities in supporting this policy, which include complying with all labor laws and regulations, treating colleagues and suppliers with respect and fairness, and actively contributing to a workplace free from discrimination, harassment, or forced labor.

I agree to report any concerns or violations related to human rights or labor practices through the appropriate channels, participate in required training programs, and support initiatives aimed at improving workplace conditions and social responsibility.

By signing below, I confirm my commitment to upholding the APackaging Group Labor and Human Rights Policy and supporting APG's mission to lead with integrity, ethical practices, and respect for people across its global operations.

Employee Name: *Ashley Darling*

Employee Signature: *Ashley Darling*

Date: *1/1/25*







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**Employee Name:** Sara Gerschutz

**Employee Signature:** Sara Gerschutz

**Date:** 1/1/25

