

Group Human Rights Policy

Date issued	February 27, 2018
Approved by	Global Executive Team
Mgmt responsibility	Sustainability and Communications

Version	2.0
Version created	October 16, 2023

Group Human Rights Policy

1. Purpose

We believe in protecting food, people and the planet. Packaging makes food and everyday necessities available, more accessible, and affordable, secures hygiene and food safety, prevents food loss and waste and continues to enable social and economic progress, all around the world. At Huhtamaki, we embed sustainability in everything we do. Our social responsibility focus is on securing good working conditions across all our operations globally, safeguarding human rights across the entire value chain and aiming for fair employment practices for everyone, everywhere. We are committed to being good corporate citizens with a positive impact on the communities we operate in. The objective of this policy is to create a global and group-wide understanding of Huhtamaki's human rights commitments.

2. Scope

This Policy is applicable to all Huhtamaki companies, and all Huhtamaki employees, members of the management, officers and directors ("employees"), as well as parties acting on Huhtamaki's behalf, such as agents and consultants. Our [Code of Conduct](#) is the foundation for all our operations and also sets the frame for how we respect human rights in our own organization. We expect our business partners to adhere to similar principles. Drawn from our own code, the [Code of Conduct for Huhtamaki Suppliers](#), lays out our expectations for our suppliers in terms of respecting human rights.

3. Our commitments to human rights

This global Human Rights Policy outlines our commitment to respect human rights in our own organization and in our value chain. We support internationally recognized principles and frameworks on human rights, such as the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the ILO Declaration on Fundamental Principles and Rights at Work. Integrity is essential in our company and in everything we do, therefore we work in compliance with all applicable laws and regulations. In some instances, local laws and regulations may not be in line with internationally recognized principles and frameworks on human rights. In these situations, we always seek ways to honor internationally recognized human rights to the extent possible.

We adhere to the following key principles, and expect the same from our suppliers and other business partners:

- Huhtamaki is committed to diversity and equal employment opportunity. We treat everyone with dignity and respect. We do not tolerate discrimination in any employment decisions, including recruitment, hiring, placement, development, promotion, training, scheduling, benefits, compensation and termination. Regardless of personal characteristics, we do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind.
- We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to external or internal threats.
- The rights of employees to form, join, or not join labor unions is respected. Where employees are represented by a legally recognized union, we are committed to establishing a constructive

dialogue with their freely chosen representatives and to bargaining in good faith with such representatives. We are committed to engaging with all our employees to establish an open two-way dialogue and feedback mechanisms to continuously improve our operations together everywhere, including in such locations where legal restrictions to forming and/or joining labor unions exist.

- All employees have the right to fair and decent working conditions. This includes wages that amount to at least the legal minimum wage or the local prevailing wage, whichever is higher; and reasonable working hours in compliance with applicable local laws.
- We do not use child labor and comply with applicable standards, laws and regulations for the protection of workers under age 18. Under no circumstances may employees be younger than 15 years of age, unless exceptions recognized by the ILO apply. In addition, no person under age 18 shall do work that might jeopardize their health, development, or interfere with school.
- We prohibit the use of all forms of forced labor and modern slavery, including trafficked, indentured or bonded labor, prison labor or other forms of involuntary labor. Workers' passports or identity documents should not be withheld, and no workers should pay recruitment or other fees in order to secure work.
- Our operations are conducted in a manner that protects the health and safety of employees, contractors, and visitors. We comply with all applicable safety and health laws, regulations and internal requirements. We are committed to continuously improving health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.
- We actively work to protect the environment and support our communities in a manner that is environmentally responsible. Our environmental commitments are outlined in our Global Environmental Policy.
- We strive to positively contribute to the well-being of the communities in which we live, work, and serve.

We also recognize the importance of considering potentially vulnerable and marginalized groups, such as migrant workers. We aim to take into account the unique challenges for such groups, and to ensure their rights and well-being are respected.

4. Our human rights due diligence process

We are committed to the development of our due diligence process in line with international guidelines on human rights due diligence, specifically the [United Nations Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#). This includes steps such as integrating sustainability into business processes, identifying salient human rights, taking measures to address these issues, monitoring progress and regular, transparent communication, providing effective grievance mechanisms and remedy in case of any violations. We are committed to continuously improving our practices.

Because of the complexity of our operations and our supply chain, we apply a risk-based approach consistent with the UNGPs to prioritize focus areas by severity and likelihood of risk. If a risk or impact is identified, we take into account whether we cause, contribute or are linked to an adverse risk or impact when deciding on the type of mitigating actions to take. The Huhtamaki Group Guiding

Principles for Responsible Procurement outline our commitment to managing and addressing upstream risks and impacts to people, societies and the environment.

Providing remedy and grievance mechanisms

We are aware that despite the measures we take to ensure human rights are respected, human rights impacts can still occur in our own organization and in our value chain. We have established channels in place that our employees can use to report in case they believe there has been a violation of this policy or applicable laws and regulations. In addition to our own employees, any individual, company or local community representative who believes that a Huhtamaki employee, or anyone acting on behalf of Huhtamaki (including our suppliers), has engaged in illegal or otherwise improper conduct can report the event through the [Huhtamaki Speak Up channel](#), or other channels provided by Huhtamaki. This person's relationship with Huhtamaki will not be negatively affected by raising this concern.

We are further developing our existing processes to address the complaints that we receive. However, when there is a potential or actual human rights violation occurring in our own operations or at our supplier or third party, we will address this by first focusing on the affected individual(s) or group and find appropriate remedial actions. These remedial actions should also reduce the likelihood of the impact reoccurring. We aim to address any risks and remedial actions in partnership with our suppliers. However, as a last resort Huhtamaki may end a supplier relationship if the situation is not handled in a satisfactory manner, consistent with our standards of responsible business conduct.

5. Roles and responsibilities

Each employee is responsible for acting in accordance with this Policy.

Leadership teams at global, segment and local levels are responsible for ensuring that this Policy is fully implemented in their field of responsibility.

Global Executive Team is responsible for ensuring that this Policy can be fully implemented in the organization through:

- allocating adequate resources, and
- taking appropriate action, if breaches of this Policy are suspected and/or identified.

The Global Sustainability Team has the responsibility to manage this Policy and, together with other relevant functions, assists in interpretation and practical application of this Policy.

6. Breaches against this policy

Any employee who suspects violations of this Policy or related Huhtamaki human rights commitments is expected to speak up and report the matter to their manager, over manager, local HR, Global Ethics and Compliance or through the [Huhtamaki Speak Up channel](#). Huhtamaki does not accept any form of retaliation against someone who speaks up or expresses concerns in good faith.