

Huhtamaki Human Trafficking and Modern Slavery Statement

Company profile

Huhtamaki is a global specialist in packaging for food and drink. We are a network of more than 70 business units in 34 countries with over 16,000 employees. The Group head office is located in Espoo, Finland and the parent company Huhtamaki Oyj is listed on Nasdaq Helsinki Ltd. Our practices are governed both at a global and local level.

Our responsibility

Huhtamaki is committed to complying with laws and regulations and to acting in accordance with commonly accepted best practices. Among those are regulations on human trafficking and forced labor, including but not limited to California Transparency in Supply Chains Act of 2010 and UK Modern Slavery Act 2015.

As a globally operating company we recognize our responsibility to respect international standards and practices, such as those of United Nation's (UN) Universal Declaration of Human Rights and Fundamental Rights at Work by International Labor Organization (ILO).

Human Trafficking and Modern Slavery

Supporting or participating in human trafficking and forced labor practices are clearly prohibited by the principles of Huhtamaki Code of Conduct and working conditions requirements. The requirements clearly define steps in the recruitment process to ensure that we do not contribute to human trafficking or modern slavery. The steps include but are not limited to proper verification of identity, prohibiting recruitment fees, and clearly communicating the terms and conditions of employment. Huhtamaki provides all employees regular training on Huhtamaki Code of Conduct and related employment policies.

Training programs, local policies and control points are required from all Huhtamaki sites to raise awareness on human rights and prevent human trafficking and modern slavery. We will pay special attention to training our supply chain and sourcing employees on recognizing signs of human trafficking and slavery, particular with respect to mitigating risks within our supply chain.

Suppliers

Huhtamaki seeks to do business with suppliers who share similar values and respect human rights. We require our suppliers to take actions that are consistent with the Huhtamaki Supplier Code of Conduct. Suppliers, including labor agencies and recruiters, are required to have processes to ensure that they do not take part in human trafficking or modern slavery.

The process to evaluate and address specific risks of human trafficking and slavery on our product supply chain is currently being developed. Some Huhtamaki businesses, including Huhtamaki UK and Huhtamaki Inc. (North America), have already introduced supplier onboarding and evaluation questionnaires to assess potential key suppliers for their compliance with human trafficking and modern slavery regulations and Huhtamaki Supplier Code of Conduct. Evaluation is part of the key supplier assessment, and is repeated at regular intervals.

While Huhtamaki uses its contractual right to conduct on-site audits of selected suppliers, those on-site audits do not currently include specific assessment of human trafficking and modern slavery. Other than contractual obligations and Huhtamaki's right to monitor, Huhtamaki does not have a formal supplier certification process for human trafficking.

We are in the process of incorporating the Huhtamaki Supplier Code of Conduct into our key supplier contracts as a standard term. Already now, the business relationship with a supplier that fails to perform according to the requirements stated in "Huhtamaki Code of Conduct for Suppliers" would be re-evaluated. The relationship may eventually be terminated if the supplier is not demonstrating sufficient efforts to improve.

Reporting misconducts

Huhtamaki employees are, under the terms of employment, expected to follow all applicable laws and all Huhtamaki policies, including the Huhtamaki Code of Conduct. Employees who violate the Huhtamaki Code of Conduct or any Huhtamaki employment policies are subject to disciplinary action, up to and including dismissal.

Employees are encouraged to report any and all violations of the Code of Conduct or other employment policies to their managers, an officer of the company or to the Human Resources department. Employees may utilize our company-wide anonymous hotline to report questionable behavior or actions. The hotline is communicated to all employees in annual Code of Conduct training.

Our Commitment

We are formalizing human rights due diligence practices for our interactions with employees, suppliers, customers, communities and other stakeholders. Those practices shall help us to

uncover, prevent and mitigate any potential incidences of human rights abuse, such as forced labor and human trafficking, in our operations and supply chain.

Our work in recognizing the risks, mitigating impacts and training our staff and suppliers specifically on topics associated with human trafficking and modern slavery is a continuous process. We work hard to establish robust processes, and based on our work and findings to date we have no evidence that suggests any incidences of human trafficking or modern slavery within Huhtamaki or its supply chain.