

Code of Conduct for Huhtamaki Suppliers

Huhtamäki Oyj and all its subsidiaries, associated companies and other affiliates (“We” or “Huhtamaki”) are committed to conducting business in a way that complies with laws and regulations, meets high ethical standards and respects fundamental rights of employees. We expect Huhtamaki’s suppliers and sub-suppliers, whether supplying products or services, (“You”) to conduct business in a similar way.

This Code of Conduct for Huhtamaki Suppliers (“Code”) outlines the minimum standards of business ethics and social and environmental standards that You need to comply with to establish or continue business with Huhtamaki. This Code forms an integral part of all contracts/co-operation between You and Huhtamaki.

Compliance with this Code

You will implement systems and controls that help to comply with all applicable laws and regulations and the principles in this Code, including policies, training, monitoring and auditing mechanisms. You should apply these or similar principles to the subcontractors and suppliers You work with in providing goods and services to Huhtamaki. Upon request, You are obliged to deliver a written confirmation from Your subcontractor demonstrating the subcontractor’s compliance with this Code.

Huhtamaki reserves the right to assess and monitor Your compliance with this Code, using third parties if required. You shall maintain on site all documentation that may be needed to demonstrate compliance with this Code. Huhtamaki shall treat all information received during any audits confidentially. Suppliers who are not in compliance with this Code must promptly implement any corrective actions, or they may be terminated and/or precluded from consideration of future business.

Reporting misconduct

You should report any actual or suspected non-compliance with this Code to Huhtamaki without delay. In addition, any individual, company or local community representative who believes that a Huhtamaki employee, or anyone acting on behalf of Huhtamaki, has engaged in illegal or otherwise improper conduct can report the event through Huhtamaki Speak Up channel at <https://report.whistleb.com/en/Huhtamaki>. Your relationship with Huhtamaki will not be affected by an honest report of potential misconduct.



Business ethics

Huhtamaki expects its suppliers to conduct their business as Huhtamaki strives to conduct its business; ethically and in compliance with laws and regulations.

- You do not engage in any types of bribery, corruption or kickbacks or similar payments or activities. In addition, you do not offer any gifts, hospitality or expenses (to Huhtamaki employees or any other parties) which may inappropriately influence business decisions.
- You do not participate in money laundering or financing of terrorist, military or criminal activities. You comply with applicable trade compliance laws and regulations.
- You will not enter into transactions with Huhtamaki employees that create a conflict of interest. You will declare any potential conflicts of interest to Huhtamaki prior to entering into any business transaction with Huhtamaki.

- Competition for business shall be fair and honest. You comply with all anti-trust and competition laws and regulations.
- You ensure that You meet all product specifications and quality and safety requirements, as required by law and/or mutually agreed between You and Huhtamaki.
- You keep accurate and transparent business records of all Your business transactions.
- You ensure the confidentiality and security of all non-public information concerning Huhtamaki and Huhtamaki's business partners. You respect the privacy of all Your business partners, including Huhtamaki's employees, and You protect data and intellectual property from misuse. You follow all applicable restrictions and prohibitions regarding insider information and insider trading considering that Huhtamäki Oyj is listed on Nasdaq Helsinki Ltd.

Social

Respect for people is fundamentally important to Huhtamaki and We expect our suppliers to respect human rights of their employees and treat them fairly and in compliance with laws and regulations.

- You respect human rights and fair labor practices.
- You provide employees with a safe and healthy work environment by proactively operating in accordance with recognized practices and standards. You take proactive measures, including appropriate controls, training, work procedures and personal protective equipment, to prevent workplace hazards. You must have an appointed person to manage occupational health and safety and provide medical care in case of injury.
- You treat all employees with respect and dignity, and You do not tolerate any form of harassment, intimidation or workplace violence. You have a process or channel available and communicated to employees to report any misbehavior.
- You provide equal treatment and equal employment opportunity to everyone without regard to race, color, gender, age, religion, marital status, sexual orientation, political opinion, or national or ethnic origin, or other similar characteristics. This applies to all aspects of employment decisions.

- All labor must be voluntary. Under no circumstances will You use forced or involuntary labor, whether in the form of prison, compulsory or trafficked labor, indentured labor, bonded labor or other forms. Mental and physical coercion, slavery and human trafficking are strictly prohibited. You, or any labor agency used by You, will not withhold passports or other identification documents or request employees to pay any recruitment fees.
- Under no circumstances will You employ employees under the age of 15 or under the local legal minimum age for work or compulsory education, whichever is higher.
- Young employees (under the age of 18) must not do work that might jeopardize their physical or psychological health or development, or their opportunity to attend school. You will provide young employees with appropriate training and supervision for their work tasks, and You will prohibit them from doing overtime and night work.
- You respect the right of Your employees to associate, organize, belong to a union and bargain collectively in a lawful and peaceful manner without fear of retaliation.
- You will not require employees to work more than the regular and overtime hours allowed by the laws and regulations of the country where the employees are employed. All overtime work by employees must be on a voluntary basis. You will provide employees with at least 1 day of rest after 6 consecutive days of work.
- You compensate all employees with wages, overtime premiums, and benefits that meet or exceed legal requirements or collective agreements, whichever are higher. Salaries must be paid on time and in full, with only legal deductions.

Environment

Huhtamaki cares for the environment and expects its suppliers to be similarly committed to conduct business in a way that preserves the environment in compliance with laws and regulations.

- You will ensure that every manufacturing facility complies with all applicable environmental laws and regulations related to air emissions, water discharges and waste disposal.
- You hold all legal permits necessary for Your operations and comply with such permits.
- You make every effort to reduce the environmental impact of Your operations and safeguard the natural resources on which we all depend.
- You will not source materials, directly or indirectly, that contribute to deforestation of high conservation value areas, or interfere with the habitats of endangered species.