

CODE OF CONDUCT FOR HUHTAMAKI SUPPLIERS

1 Introduction

Huhtamaki is committed to complying with laws and regulations, applying high ethical standards and respecting fundamental rights of employees when conducting business. Huhtamaki expects all of its suppliers, whether supplying products or services directly to Huhtamäki Oyj or any of its subsidiaries, associated companies or other affiliates (“**Huhtamaki**”) or indirectly as a sub-supplier, to conduct business in a similar way. This Code of Conduct for Huhtamaki Suppliers (“**Code**”) outlines the minimum standards Huhtamaki requires its suppliers and sub-suppliers (jointly “**Suppliers**”) to comply with when doing business with or for Huhtamaki.

This Code forms an integral part of all contracts between Huhtamaki and its Suppliers.

2 Compliance with laws and regulations

2.1 Bribes, corruption and gifts

All applicable anti-corruption laws and regulations need to be followed and Suppliers shall have adequate procedures to prevent bribery and corruption. Bribes or other similar payments to uphold or contribute to business shall not be paid or accepted. Improper payments are not limited to payments of cash or currency but may include anything sufficiently valuable (trips, gifts, events etc.) that may be construed as impacting the recipient’s decision-making process. Huhtamaki’s employees shall not be offered any gifts, hospitality or expenses that could be considered unreasonable or inappropriate considering potential business transactions.

2.2 Money laundering and business records

Participation in money laundering or financing of terrorist, military or criminal activities in any way is strictly prohibited. All business transactions shall be accurately and transparently reflected in business records. No false or misleading information is allowed to be included in any business records and payments will be made only if they are supported by appropriate documentation.

2.3 Conflicts of interest

Conflicts of interest between Huhtamaki and its Suppliers shall be avoided. A conflict of interest occurs when a person has a personal interest or is involved in an activity that could interfere with such person’s ability to perform tasks in an objective, impartial and effective manner. An apparent conflict of interest occurs when personal interests or activities could lead others to doubt the objectivity or impartiality of the person. All actual and apparent conflicts of interest between Huhtamaki and its Supplier shall be reported to Huhtamaki prior to entering into any business transaction with Huhtamaki.

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2.4 Confidentiality of information

Suppliers shall ensure the confidentiality and security of all non-public information concerning Huhtamaki and Huhtamaki's business partners. When obtaining information on Huhtamaki's employees, all applicable data privacy laws and regulations shall be followed. As the shares of Huhtamäki Oyj are listed on Nasdaq Helsinki Ltd., all applicable restrictions and prohibitions regarding insider information and insider trading shall also be followed. Further information on applicable insider regulations is available in the Guidelines for insiders issued by Nasdaq Helsinki Ltd.

2.5 Fair dealings, fair competition and anti-trust laws

Dealings with all business partners shall be fair and Suppliers shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice. Competition for business shall be fair and honest. Any activities that distort free competition are prohibited and Suppliers shall strictly comply with all anti-trust and competition laws and regulations.

2.6 Product suitability and safety

The safety and quality of food and drink packaging products and services is of utmost importance to Huhtamaki. Suppliers shall ensure that all specifications as well as quality and safety, including food safety, requirements and guidelines imposed by legal requirements and/or Huhtamaki are met and that supplied materials and products are suitable and safe for their intended purpose of use.

3 Fundamental rights of employees

3.1 Respect for human rights and fair labor practices

Suppliers shall respect human rights and fair labor practices. Suppliers follow the United Nations' human rights declarations, including the Universal Declaration of Human Rights and the Declaration of the Rights of a Child, as well as the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

3.2 Forced, involuntary or child labor

Suppliers shall not use any forced or involuntary labor, whether prison, bonded or indentured labor. No child labor shall be used, the term "child" referring to a person younger than 15 years (14 years in certain countries), or if higher, the local minimum age for employment or the age for completing compulsory education. When young persons under 18 years are employed, their work shall not jeopardize their education and they shall be provided with appropriate training and supervision for their work tasks.

3.3 Diversity and equal opportunity

Suppliers are required to provide equal treatment and equal employment opportunity to everyone without regard to race, color, religion, gender, sexual orientation, national origin, age, disability, veteran, marital or domestic partner status, citizenship, family relationship or any other similar characteristic. This should apply to all aspects of employment decisions, including recruitment, hiring, placement, development, promotion, training, scheduling, benefits, compensation and termination.

3.4 Harassment and workplace violence

Suppliers are required to treat their employees with dignity and respect and no harassment of any kind, including sexual harassment, racial harassment or any other type of behavior that is hostile, disrespectful, abusive and/or humiliating, shall be tolerated by Suppliers. Further, no workplace violence of any kind is tolerated.

3.5 Compensation and work time

We expect Suppliers to recognize that wages are essential to meeting employees' basic needs. Suppliers shall, at a minimum, comply with all applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits. In addition, except in extraordinary business circumstances, employees shall be entitled to at least one day off in every seven day period. Where local industry standards are higher than applicable legal requirements, we expect Suppliers to meet the higher standards.

3.6 Freedom of association and the right to bargain collectively

Suppliers shall respect the rights of employees to associate, organize, belong to a union and bargain collectively in a lawful and peaceful manner, without penalty or interference, in accordance with ILO principles and applicable laws and regulations.

3.7 Workplace health and safety

Suppliers shall provide employees with a safe workplace in compliance with all applicable laws and regulations, ensuring at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation. Suppliers shall have adequate occupational health and safety policies and practices which demonstrate the Supplier's commitments towards health and safety of employees and provide measures to monitor health and safety performance. Occupational health and safety policies shall be communicated throughout the organization and employees shall be appropriately trained on health and safety matters. Suppliers shall also ensure that the same standards of health and safety are applied in any housing that they provide for employees.

4 Environmental impact

4.1 Compliance with environmental laws and permits

Suppliers shall comply with all environmental requirements defined in applicable laws and regulations. Suppliers shall hold all legal permits necessary for their operations and comply with the terms and restrictions of such permits.

4.2 Environmental policies, training and reporting

Suppliers shall have environmental policies in place imposing rules and instructions to be applied throughout the organization and governing environmental impacts of Supplier's operations. Such policies and procedures shall govern e.g. water, energy, hazardous materials, emissions to air, waste and other relevant environmental aspects. Suppliers shall also have assigned responsibility for environmental issues within the organization. Suppliers' employees shall be trained on environmental issues to ensure knowledge of and compliance with all necessary legal requirements. All environmental complaints and violations shall be handled systematically and communicated to employees as well as external stakeholders, including Huhtamaki, to the extent external stakeholders are affected.

4.3 Working towards more sustainable operations

Suppliers shall conduct their business in a manner which embraces sustainability and reduced negative environmental impact. Sustainability practices are embedded across Supplier's operations and actions which aim to reduce the generation of waste, greenhouse gas emissions and the consumption of water and energy are taken. Suppliers undertake a systematic review of their sustainability practices and environmental management systems regularly.

5 Communication and monitoring

5.1 Communication of the Code

Suppliers shall ensure that the provisions of this Code are communicated to and followed by Suppliers' employees. Suppliers shall also take appropriate steps to ensure that Suppliers' subcontractors comply with this Code. Upon request, Supplier is obliged to deliver a written confirmation from its subcontractor demonstrating the subcontractor's commitment and compliance with this Code.

5.2 Reporting of non-compliance with the Code

Suppliers shall report any actual or suspected non-compliance with this Code to Huhtamaki without delay. Suppliers who believe that an employee of Huhtamaki, or anyone acting on behalf of Huhtamaki, has engaged in illegal or improper conduct, shall also report the matter to Huhtamaki without fear of negatively affecting the business relationship by an honest report of potential misconduct. Suppliers and any individual employee of Supplier can report their concerns confidentially through Huhtamaki Speak Up channel which can be accessed by visiting the website: <https://report.whistleb.com/Huhtamaki>.

In addition to the above Group-wide reporting channel available for all Suppliers and their individual employees, Suppliers active in the United States can additionally use the Alertline® hotline for reporting their concerns confidentially to:

- call at 1-877-874-8416; or
- visit the website www.ALERTLINE.com, enter “Huhtamaki” in the organization field, select “Huhtamaki” and select “Report your concern”.

5.3 Audits at Suppliers’ facilities

Suppliers shall authorize Huhtamaki and its designated agents (including third parties) to engage in monitoring activities to confirm compliance with this Code, including unannounced on site audits of Suppliers’ facilities, reviews of books and records relating to compliance with this Code and private interviews with employees. Suppliers shall maintain on site all documentation that may be needed to demonstrate compliance with this Code. Huhtamaki shall treat confidential all information received during any audits.