

## Code of Conduct

This is a summary of the key provisions of Huhtamaki's Code of Conduct ("Code") that are relevant for Huhtamaki's customers, investors and other stakeholders. The Code is applicable to Huhtamäki Oyj and any of its subsidiaries, associated companies and other affiliates ("Huhtamaki").

### Compliance with Laws

Huhtamaki is committed to complying with laws and regulations and to acting in accordance with commonly accepted best practices. Violations of any laws or regulations or unethical business dealings are not accepted.

Huhtamäki Oyj, the ultimate parent company of Huhtamaki group, is listed on Nasdaq Helsinki Ltd. and follows the corporate governance related laws and regulations effective in Finland.

### Bribes, Corruption and Gifts

Huhtamaki and its employees do not pay or accept bribes or other similar payments to uphold or to contribute to Huhtamaki's business. Improper payments to anyone, whether authorities, business partners, customers or anyone else, for any reason are not allowed to be offered or made. Business is obtained solely based on the merits of Huhtamaki's products and services.

### Conflicts of Interest

Huhtamaki's employees are expected to avoid conflicts of interest that can occur when an employee has a personal interest or is involved in an activity that could interfere with such employee's ability to perform tasks in an objective, impartial and effective manner.

### Money Laundering and Export Controls

Huhtamaki does not participate in money laundering or financing of terrorist, military or criminal activities in any way. The origin and the purpose of use of Huhtamaki's funds shall be verified to be acceptable before making any payments. Employees shall never accept cash as payment for Huhtamaki's products or services. Each Huhtamaki group company complies with applicable export control regimes. Such regimes may include trade restrictions prohibiting companies from engaging in certain business activities in specified countries as well as with specified individuals and entities.

### Confidentiality of Information

All non-public information about Huhtamaki is kept confidential. Non-public information includes any sensitive information about Huhtamaki, its products, production facilities and techniques, customers, suppliers, other business partners or employees.

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## **Communicating with the Public**

As a publicly listed company Huhtamäki Oyj is committed to making full, fair, accurate, timely and understandable financial and other disclosures to the public and follows related laws, regulations and guidelines.

## **Product Suitability, Safety and Compliance**

Huhtamaki strives to ensure that the products it manufactures and supplies are made according to the relevant specifications and that quality standards and controls as well as applicable legal requirements are followed.

## **Competition Law Compliance**

Antitrust laws and competition regulations are to be strictly complied with. Competition for business shall be fair and honest. Any activities that distort free competition are prohibited.

## **Fair Dealing and Marketing Practices**

Huhtamaki deals fairly with customers, suppliers and competitors. Huhtamaki does not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

At Huhtamaki the products and services are described truthfully and accurately. Misleading customers through deceptive acts or practices, false advertising, misrepresentations regarding Huhtamaki's or competitors' products and services or other unfair methods of competition are not allowed.

## **Political and Social Activity and Donations**

Huhtamaki as a company does not participate in or support political activity. Huhtamaki may, with approval of relevant corporate bodies, donate moderate amounts of money or goods to support education, science, arts, culture or social welfare.

## **Environment and Sustainability**

Respecting the environment is important for Huhtamaki. The principles of the International Chamber of Commerce (ICC) Business Charter for Sustainable Development are honored at Huhtamaki. Huhtamaki focuses on minimizing natural resource depletion, optimizing process efficiency, using the best applicable technologies and practices, and reducing solid waste generation, effluent discharges and emissions to air.

## **Respect for Human Rights and Fair Labor Practices**

Huhtamaki supports the International Labor Organization (ILO) Principles promoting equal opportunities and including fundamental human rights for all employees, fair compensation,

freedom of association and the right to bargain collectively in a lawful and peaceful manner. Huhtamaki shall not use any forced or involuntary labor, whether prison, bonded or indentured labor. No child labor is used. Employee privacy is respected. Huhtamaki's employees are supported to maintain or create a healthy balance between work and freetime. At minimum, the local regulations on family leaves and benefits are followed.

## **Diversity and Equal Employment Opportunity**

Huhtamaki is committed to diversity and equal employment opportunity. The unique attributes and perspectives of every employee are respected. Equal treatment and equal employment opportunity are provided 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.

## **Compensation and Professional Development**

It is Huhtamaki's philosophy to pay according to the relevant local market and provide market competitive total compensation to employees. Huhtamaki will, at a minimum, comply with all applicable labor laws and regulations, including those relating to minimum wages, hours and other elements of compensation, including legally mandated benefits.

The objective of Huhtamaki is to ensure the continuous success and development of the organization which can only be achieved through people, their competence, motivation and commitment. Thus the employees are encouraged to maintain and develop their competence by providing them possibilities to educate themselves and to graduate to more demanding tasks.

## **Workplace Safety**

Huhtamaki is committed to providing a healthy and safe workplace for employees, in compliance with applicable laws and regulations. It is the aim of Huhtamaki to prevent accidents and to mitigate health and safety risks with action programs. All accidents, concerns and dangerous situations shall be reported in accordance with internal guidelines. Using, possessing or being under the influence of illicit drugs or alcohol on Huhtamaki's property during work time is strictly prohibited.

## **Workplace Violence and Harassment**

At Huhtamaki no workplace violence of any kind is tolerated. Actions that are intimidating or threatening are likewise prohibited. To help ensure a safe work environment for all employees, no employee may use or possess fire arms or other weapons at any time while on Huhtamaki premises or while conducting business on behalf of Huhtamaki.

No harassment of any kind, including sexual harassment, racial harassment and any other type of behavior that is hostile, disrespectful, abusive and/or humiliating, is tolerated at Huhtamaki.

## Supply Chain

Huhtamaki's suppliers are expected to follow similar ethical policies and principles as the Code. Huhtamaki's Code of Conduct for Suppliers must be communicated to all suppliers and is available on Huhtamaki's website at [www.huhtamaki.com](http://www.huhtamaki.com).

## Violations of the Code and Huhtamaki Speak Up channel

In addition to disciplinary actions and even termination of employment, Huhtamaki's employees' failure to comply with the Code may result in criminal penalties, damages compensation and/or other civil sanctions. If an employee becomes aware that another Huhtamaki employee has violated the Code, any other policies of Huhtamaki or any laws or regulations, the employee is expected to report the violation. Violations can be reported to the employee's manager, over manager or a human resources representative. Alternatively or additionally, reports can also be made to Global Compliance or through Huhtamaki Speak Up channel where the report can also be made anonymously if allowed by local laws and regulations. Any negative actions against an employee who reports a possible violation are explicitly prohibited. Suppliers, customers and other stakeholders are also able to report suspected violations through this channel.

Huhtamaki Speak Up channel can be accessed by visiting the website [report.whistleb.com/Huhtamaki](http://report.whistleb.com/Huhtamaki).

United States: Huhtamaki employees, suppliers, customers and other stakeholders in the United States can additionally use the Alertline® hotline for reporting the violations of this Code, any other policies of Huhtamaki or any laws or regulations. The Alertline® hotline can be accessed in the following manner: Call at 1-877-874-8416; or visit the website [www.ALERTLINE.com](http://www.ALERTLINE.com), enter "Huhtamaki" in the organization field, select "Huhtamaki" and select "Report your concern".