

Group Human Rights Policy

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1. Purpose

At Huhtamaki, our North star is to be the first choice for sustainable packaging solutions. Our innovative products protect food, beverages and personal care products, ensuring hygiene and safety and driving accessibility and affordability for people around the world. Our social responsibility focuses on securing good working conditions across all our operations globally, safeguarding human rights across the entire value chain and ensuring fair employment practices for everyone, everywhere. We are committed to being a good corporate citizen with a positive impact on the communities in which we operate.

The objective of this Policy is to create a common, groupwide understanding of Huhtamaki's human rights commitments, and to set out the ambition, processes and responsibilities through which we deliver on these commitments and measure our progress.

2. Scope

This Policy applies to all Huhtamaki companies and operations in every country in which we operate, and to all Huhtamaki employees, members of the management, officers and directors ("employees"), whether employed on a permanent, temporary, full time or part time basis. It also applies to parties acting on Huhtamaki's behalf, such as agents and consultants. Agency workers and contractors working at our sites are to be treated in line with the principles of this Policy. Businesses acquired by Huhtamaki are brought within the scope of this Policy as part of their integration.

Our Code of Conduct is the foundation for all our operations and sets the frame for how we respect human rights in our own organization. Beyond our own operations, this Policy covers our value chain. We expect our business partners to adhere to equivalent principles, and the Code of Conduct for Huhtamaki Suppliers, drawn from our own Code, sets out the human rights requirements that our suppliers are required to meet.

This Policy covers the following key human rights topics: employee health and safety; working conditions, including fair remuneration and a living wage; social dialogue and freedom of association; career management and training; child labor, forced labor and human trafficking; and the prevention of discrimination and harassment. It also addresses the rights of vulnerable groups and of the communities in which we operate.

3. Our commitments to human rights

This Policy sets out our commitment to respect human rights in our own organization and throughout 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, and we therefore 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 seek ways to honor internationally recognized human rights to the fullest extent possible.

We adhere to the following key principles in our own operations and expect the same from our suppliers and other business partners.

3.1 Employee health and safety

The health and safety of our employees, contractors and visitors is our highest priority. Our operations are conducted in compliance with all applicable health and safety laws, regulations and internal requirements, and we work towards workplaces free from injuries and work-related ill health.

We prevent incidents by systematically identifying hazards and assessing risks, implementing effective controls, providing mandatory health and safety training, investigating incidents and near misses to address their root causes, and continuously improving our health and safety management. Every employee and contractor has the right and the responsibility to stop any work they consider unsafe, without fear of retaliation.

3.2 Working conditions and living wage

All employees have the right to fair and decent working conditions. This includes reasonable working hours and rest periods in compliance with applicable local laws, paid leave and social benefits as required by law, and clear, understandable terms of employment.

We pay wages that amount to at least the legal minimum wage or the local prevailing industry wage, whichever is higher. Beyond this, Huhtamaki is committed to regularly evaluating wages against recognized living wage benchmarks, monitoring any identified differences and taking appropriate actions over time to improve wage outcomes. A living wage is the remuneration received for a standard work week that is sufficient to afford a decent standard of living for the worker and their family, covering food, water, housing, education, healthcare, transport, clothing and other essential needs, including provision for unexpected events. We periodically review relevant living wage benchmarks and changes in the cost of living, use the findings to inform improvement actions and monitor progress over time. Our living wage process is described in Section 5.

We monitor working conditions and employee satisfaction through our annual employee survey, and we act on the results together with our employees.

3.3 Social dialogue and freedom of association

We respect the right of employees to form, join or not join labor unions. 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 through open, two way dialogue and feedback mechanisms to continuously improve our operations together everywhere, including in locations where legal restrictions on forming or joining labor unions exist.

3.4 Career management and training

We are committed to developing the skills and careers of our employees. All employees have access to the training they need to perform their work safely and effectively, including mandatory health and safety and compliance training. Where organizational changes affect employment, we manage them responsibly, in consultation with employees and their representatives, in compliance with applicable laws, and with measures to support the employees affected.

3.5 Child labor, forced labor and human trafficking

We do not use child labor and we comply with applicable standards, laws and regulations for the protection of workers under the age of 18. Under no circumstances may employees be younger than 15 years of age, unless exceptions recognized by the ILO Minimum Age Convention (No. 138) apply. No person under the age of 18 shall perform work that might jeopardize their health, safety or development, or interfere with their schooling.

We prohibit all forms of forced labor and modern slavery, including trafficked, indentured or bonded labor, prison labor and any other form of involuntary labor. Workers' passports or identity documents are never withheld, workers are free to end their employment on reasonable notice, and no worker shall pay recruitment or other fees in order to secure work. Where such fees are identified, we ensure they are reimbursed. We prevent these risks through age and identity verification in recruitment, responsible recruitment practices, including when we work with recruitment agencies, and the supplier requirements and risk assessment described in Section 5.

3.6 Diversity, inclusion and the prevention of discrimination and harassment

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 free from violence, harassment, including sexual harassment, bullying, intimidation and other unsafe or disruptive conditions due to external or internal threats. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind.

3.7 Vulnerable groups, communities and the environment

We recognize the importance of considering potentially vulnerable and marginalized groups, such as migrant workers, young workers, women and persons with disabilities. We take into account the specific challenges faced by such groups and work to ensure that their rights and wellbeing are respected.

We strive to contribute positively to the wellbeing of the communities in which we live, work and serve, and we operate in a manner that protects the environment. Our environmental commitments are set out in our Group Environmental Policy.

4. Our human rights ambition

To drive and measure delivery of our Human Rights ambition, we have defined the following indicators. Unless stated otherwise, targets apply to all Huhtamaki employees and operations within the scope of this Policy and are measured against a baseline year of 2025 unless otherwise stated.

Topic	Ambition	Indicator
Employee health and safety	Total Recordable Incident Frequency Rate (TRIFR) to be 0.5 or below by 2030.	Number of fatalities; LTIFR and TRIFR
Working conditions	Maintain participation rate of at or above manufacturing industry standards, in the annual employee engagement survey and maintain a Leadership Index score at or above the manufacturing industry benchmark (like 70%).	Employee engagement survey participation rate; Leadership Index
Living wage	Regularly evaluate wages against recognized living wage benchmarks, monitor potentially identified differences and take appropriate actions to address those.	Share of employees paid at or above the applicable living wage benchmark
Career management and training	Monitor, maintain and improve training completion rate for DEI onboarding and mandatory health and safety training to reach 100%	Training completion rates
Child labor, forced labor and human trafficking	By 2028, 100% of new direct material suppliers are onboarded through our risk-based sustainability due diligence process (Know Your Business Partner process).	New Supplier Due Diligence Completion Rate (%)
Discrimination and harassment	Maintain an Inclusion Index score at or above the manufacturing industry benchmark, every year, and ensure that 100% of reported concerns of discrimination or harassment are investigated and, where substantiated, are addressed with corrective action.	Inclusion Index; share of reported concerns investigated and closed

Progress against each indicator is tracked through our human resources, health and safety, and procurement reporting systems, and is consolidated annually by the Global Sustainability Team together with Group HR, Group Health and Safety and Group Procurement. Health and safety performance is additionally reviewed regularly at site, segment and Group level. The Global Executive Team reviews progress annually and decides on corrective actions where progress is behind plan. Progress against our targets on material topics is disclosed annually in the Sustainability Statement of our Annual Report.

5. Our human rights due diligence process

We are committed to developing our human rights due diligence process in line with international guidelines on human rights due diligence, specifically the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This includes integrating human rights into our business processes, identifying and assessing our salient human rights issues, taking measures to prevent and mitigate adverse impacts, monitoring the effectiveness of these measures, communicating regularly and transparently, and providing effective grievance mechanisms and remedy in case of any violation. 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. When a risk or impact is identified,

we take into account whether we cause, contribute to or are directly linked to it when deciding on the type of action to take.

1. Preventing adverse impacts in our own operations

Our commitments in Section 3, our ambition and indicators in Section 4 and the processes described below form a single management cycle: we set clear expectations, build awareness and capability, measure performance, and act on the results.

- **Communication and training.** This Policy and our Code of Conduct are communicated to all employees and are available on our intranet and website. Employees complete Code of Conduct training, new employees in non-production roles complete DEI training as part of their onboarding, and all employees complete the mandatory health and safety training relevant to their role.
- **Measurement.** We track a defined set of indicators covering each of our commitments, including health and safety performance, training completion rates, the share of employees paid a living wage, and the Inclusion Index, Leadership Index and participation rate from our annual employee survey. Indicators are followed at Group, segment and site level.
- **Communication of results.** Employee survey results are shared with employees and discussed within teams, and Group level results for all indicators are reported to the Global Executive Team.
- **Action planning and follow up.** Leadership teams use the results to identify areas that fall below target or benchmark, prioritize them according to the severity of the issue and the number of people affected, and agree on action plans with clear owners and timelines. Progress on action plans is followed up in the next measurement cycle.

2. Ensuring a living wage

Huhtamaki commits to evaluate the living wage gap for every worker in its operations, identify strategies and plan to address the gaps, and track progress and transparently report on progress against the plan in achieving a living wage.

3. Managing risks in our value chain

The Huhtamaki Group Guiding Principles for Responsible Procurement set out our commitment to managing and addressing upstream risks and impacts on people, societies and the environment. Suppliers are required to commit to the Code of Conduct for Huhtamaki Suppliers, and suppliers are screened for human rights risk based on country, category and spend. Suppliers identified as high risk are subject to further assessment, such as sustainability assessments or audits, and to corrective action plans where needed.

4. Providing remedy and grievance mechanisms

We are aware that despite the measures we take to ensure human rights are respected, adverse human rights impacts can still occur in our own organization and in our value chain. We have established channels that our employees can use to report a concern if they believe there has been a violation of this Policy or of 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 matter through the Huhtamaki Speak Up channel or other channels provided by Huhtamaki.

The Speak Up channel is available to both internal and external stakeholders, free of charge, online and by telephone, in multiple languages, and anonymously where permitted by law. Information on how to access the channel is published on our website at <https://huhtamaki.speakup.report/global> and on our intranet, displayed at our sites, and communicated to suppliers through the Code of Conduct for Huhtamaki Suppliers. The relationship of any person raising a concern in good faith with Huhtamaki will not be negatively affected by doing so.

All reports are handled confidentially and assessed promptly, and we continue to develop our processes for addressing the concerns we receive. When there is a potential or actual human rights violation in our own operations or at a supplier or other third party, we address it by first focusing on the affected individuals or groups and identifying appropriate remedial actions. These remedial actions are also designed to prevent the impact from recurring. We aim to address risks and remedial actions in partnership with our suppliers. 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.

6. Roles, responsibilities and review process

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, and for implementing action plans based on the results of our human rights indicators.

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

- allocating adequate resources;
- reviewing progress against our human rights indicators at least annually; and
- taking appropriate action if breaches of this Policy are suspected or identified.

The Group Human Resources Teams, supported by the **Group Sustainability Center of Expertise**, are responsible for managing this Policy and, together with other relevant functions, assist in the interpretation and practical application of this Policy.

The Group Human Resources Teams are responsible for the processes that deliver our commitments on working conditions, living wage, career management and training, and diversity, equity and inclusion, and for reporting the related indicators. **Group Health and Safety** is responsible for our health and safety management and reporting. **Group Sustainability Center of Expertise along with Group Procurement** is responsible for implementing the human rights requirements for suppliers. **Global Ethics and Compliance** is responsible for the Speak Up channel and for the handling of reported concerns.

Review process

The **Group Sustainability Center of Expertise** is responsible for the formal review of this Policy. The Policy is reviewed at least annually, and additionally whenever there are significant changes in legislation, international standards, our business or our human rights risks. The review takes into account the results of our human rights due diligence, progress against our indicators, concerns raised through our grievance channels, and feedback from internal and external stakeholders. Any changes to the Policy are approved by the Global Executive Team.

Progress on our commitments and indicators is monitored at least annually by the Global Executive Team, reported to the Board of Directors, and material topics are disclosed publicly in the Sustainability Statement of our Annual Report.

7. Breaches of this Policy

Any employee who suspects a violation of this Policy or of related Huhtamaki human rights commitments is expected to speak up and report the matter to their manager, their manager's manager, local HR, Global Ethics and Compliance or through the Huhtamaki Speak Up channel. Huhtamaki does not accept any form of retaliation against anyone who speaks up or expresses concerns in good faith.

Violations of this Policy may lead to disciplinary action, up to and including termination of employment, in accordance with applicable local laws. Where a business partner fails to meet the principles of this Policy, Huhtamaki may review or end the business relationship.