Huhtamaki

Group Environmental Policy

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Group Environmental Policy

1 Overview and Purpose

At Huhtamaki, we are committed to protecting food, people and the planet. We believe in the essential nature of packaging in maintaining safe, hygienic, affordable and accessible everyday necessities and focus on offering sustainable packaging solutions for consumers around the world. Our innovative products protect food and beverages on the go and on the shelf, along with other goods, ensuring hygiene and safety and helping prevent food waste.

For us, sustainability means considering our impact, both positive and negative, throughout the value chain, in terms of the environment, social responsibility and governance.

2 Scope and Application of Policy

The objective of this Policy is to enable a global and group wide understanding of Huhtamaki's environmental commitments as well as to provide guidance to our Business Segments, operations and functions on how to meet our group commitments.

The Group Environmental Policy is adhered to by Huhtamäki Oyj, all its subsidiaries, associated companies and other affiliates, and applies organization wide. It applies to all employees, as well as consultants, agency personnel and joint vendors who work at Huhtamaki premises or are under the direction of Huhtamaki. The Code of Conduct for Huhtamaki suppliers outlines the Huhtamaki environmental standards for Huhtamaki's suppliers and supplier compliance obligations remain governed by the Supplier Code of Conduct, and that this Policy sets the Group ambition that the Supplier Code of Conduct aligns with.

This Policy covers our direct operations and, where relevant, our upstream and downstream value chain, including suppliers, contractors, customers and business partners.

This Policy is publicly available on Huhtamaki's website and is reviewed periodically.

The Policy is related to and aligned with relevant environmental policies in Huhtamaki's Business Segments.

This Policy is aligned with the goals of the Paris Agreement, with the Kunming Montreal Global Biodiversity Framework and, in respect of our water related commitments, with Sustainable Development Goal 6 on Clean Water and Sanitation.

3 Group Environmental Policy Statement

- Huhtamaki will ensure compliance with all applicable local, national and regional environmental legislation as well as other applicable standards.
- Our aim is to go beyond legal compliance as may be deemed necessary by continuously improving our environmental management and performance through our Global Environment Management Standards, and related Risk Management and Control Standards.

- We commit to stakeholder engagement and capacity building with employees, suppliers, customers and partners on environmental issues, including industry bodies, government agencies, business partners and other stakeholder organizations, to promote environmental care, increase knowledge and disseminate best practice.
- We undertake appropriate reviews and evaluation of our operations to measure progress and to ensure compliance with this Policy.
- As described in our Enterprise Risk Management (ERM) process, we apply a precautionary approach in our decision making and integrate environmental principles in our business strategy.
- We have developed a global sustainability dashboard with essential key performance indicators that help us monitor and communicate on our progress against our 2030 sustainability ambitions. These key performance indicators reflect part of our ESG agenda and are revised from time to time, as needed.
- We maintain timebound milestones and targets for material environmental topics, including climate, water, circularity and forest related commitments, and disclose our progress annually.
- We recognize the linkages and trade offs across environmental topics, including climate, water, biodiversity, forests, resource use and circularity, and take these into account in our decision making.

We seek to ensure that our policy engagement, including any engagement with industry bodies and government agencies, is consistent with our environmental commitments and with the goals of the Paris Agreement.

4 Training and Reporting of Non-compliance

We actively communicate in order to ensure that employees, suppliers and partners are aware of the Group Environmental Policy, our Global Environment Management Standards and related Risk Management and Control Standards and motivated to apply them, as well as being aware of their own responsibilities and given the necessary training and support.

At Huhtamaki, everyone has a role in ensuring the protection of our environment. Everyone is encouraged to report any noncompliance to their manager or HR representative. Alternatively, the Huhtamaki Speak Up channel can be used. Messages through the Speak Up channel can be submitted anonymously, if allowed by local laws and regulations.

Every year, multiple training programs are conducted for our business segment and corporate teams on a wide variety of environmental topics, that enable them to conduct their responsibilities effectively, support customers on sustainability actions and increase awareness of environmental topics amongst the workforce.

5 Huhtamaki 2030 Sustainability Ambition

Huhtamaki is committed to delivering sustainable and safe packaging solutions responsibly. We create value for our customers, shareholders and employees while aiming to improve our environmental footprint, across the life cycle of our products.

Huhtamaki's sustainability ambition currently focuses on the following areas:

6 Climate Change

We are committed to:

- Net zero GHG emissions across Scopes 1, 2 and 3 by 2050, with 2030 Greenhouse Gas (GHG) emissions reduction targets aligned with the 1.5°C trajectory for Scope 1 and 2 and well below 2°C trajectory for Scope 3 emissions.
- Working towards decoupling production and carbon intensity by smart integration of renewables, energy efficiency and other sustainable solutions to achieve decarbonization.
- Maximizing renewable electricity by year on year, subject to credible market instruments and availability.

7 Resource Use and Circularity

We are committed to:

- 100% of our products are designed to be ready to recycle, compost or reuse in collaboration with customers
- Maximizing use of recycled or renewable content in our raw materials, aligned with customer needs
- In our operations, maximizing the share of nonhazardous waste recycled as well as minimizing the share of waste sent for landfilling, in consideration of applicable local regulations and infrastructure.
- Tackling the waste challenge by minimizing production waste and designing products for circularity at their end-of-life phase.
- Enabling the circular economy by designing packaging solutions that are ready to recycle. Actual recycling rates are dependent on the local availability of infrastructure and consumer behavior.

8 Water

We are committed to:

- Reducing water consumption volumes and intensity, particularly in water stressed or high-risk locations, through the principles of circular water management: reducing water loss by boosting water efficiency, reusing water when technically possible, recycling water, and restoring water at the same or better quality as may be necessary.
- Maintaining site specific water management plans for all Huhtamaki manufacturing sites, and driving reduction in water consumption intensity.
- Reducing water withdrawal volumes and intensity where material.
- Controlling, reducing and, where feasible, eliminating water pollution from our operations and value chain.

- Supporting safely managed water, sanitation and hygiene (WASH) in our workplaces and, where material, in local communities.
- Seeking to conserve freshwater ecosystems in water stressed or high risk locations.
- Seeking opportunities for water stewardship and collective action in water stressed or high risk basins.
- Engaging and building capacity with relevant stakeholders on water stewardship, pollution prevention and efficient water use.
- Monitoring water related risks at our sites and incorporating mitigation measures through our Enterprise Risk Management Process at places of identified high risk.

9 Forests

We are committed to:

- Having traceability systems in place to track and monitor the origin of the forest-based materials we use, together with our suppliers.
- Zero deforestation and conversion in our virgin fiber supply chain.
- Enhancing the sourcing of virgin wood fiber from sustainably managed forests either certified by Forest Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC), Sustainable Forestry Initiative (SFI) or other comparable and reputable certification schemes, working with our suppliers to ascertain that they are compliant with our Supplier Code of Conduct and with our other requirements on sourcing of virgin fiber.
- We apply a cutoff date for our commitment to no deforestation or conversion of natural ecosystems related to our own virgin fiber supply chain as being no later than December 31, 2020. In specific cases where we apply certification standards, we may apply cutoff dates set by the relevant scheme rules. These cutoff dates are used to determine the date after which deforestation or conversion are considered unacceptable under the Policy.
- Where deforestation or conversion linked to our supply chain is identified after the applicable cutoff date, requiring or supporting, where feasible and proportionate to our impact, remediation, restoration and or compensation.
- Supporting the use of the High Conservation Value approach in relevant forest based supply chains.
- Supporting best management practices for soils and peat and avoiding development on peat where relevant to forest-based supply chains.
- In implementing our forest related commitments, respecting internationally recognized human rights, customary rights to land and resources, and free, prior and informed consent (FPIC) of Indigenous Peoples and local communities, as set out in relevant Group policies and supplier requirements.
- Aligning our biodiversity and forest related commitments with the Kunming Montreal Global Biodiversity Framework.

10 Chemicals

We are committed to:

- Complying with all applicable global, regional and national chemicals related legislation including REACH (Regulation (EC) No 1907/2006) and CLP in the EU and the United Nations' Globally Harmonized System (GHS) worldwide.
- Protecting the environment and public health, seeking to reduce or phase out hazardous substances where safer, technically feasible alternatives are available, in line with applicable regulation and customer and product safety requirements.

Version Management

Version	Amendment	Approved
V2.0 (2021)	Sustainability Center of Excellence. New Group Environmental Policy developed based on an existing internal policy.	Global Executive Team
V2.1 (2022)	Sustainability Center of Excellence. Appendix A amendment: Science Based Targets initiative approval added, sustainability dashboard updated.	Sustainability and Communications
V3.0 (2022)	Group sustainability, Environment. Appendix A amendment: biodiversity and deforestation commitments added, product stewardship approach covering the full product life cycle added, international frameworks related to proactive chemicals management added, sustainability dashboard updated.	Global Executive Team
V4.0 (2025)	Sustainability Center of Expertise. Climate targets updated in line with 1.5°C trajectory. Clarification on cutoff date for deforestation added as per EUDR requirements and industry practice. Operational details removed; language modified to remove statements that may be perceived as claims.	Global Executive Team
V5.0 (2026)	Sustainability Center of Expertise. Added public availability, organization wide and value chain scope statements, Paris Agreement, Kunming Montreal Global Biodiversity Framework and SDG 6 alignment statements and renamed sections 6, 8 and 9 to match CDP terminology (Climate Change, Water, Forests).	Global Executive Team