

GROUP SPEAK UP AND INVESTIGATIONS POLICY

Date issued	November 26, 2019
Issued by	Global Executive Team
Mgmt responsibility	Global Ethics and Compliance, Corporate Affairs and Legal
Version	2.1
Version created	September 19, 2025
Latest review	September 19, 2025

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GROUP SPEAK UP AND INVESTIGATIONS POLICY

1 Purpose

Huhtamäki Oyj, together with its subsidiaries, associated companies and other affiliates, ("Huhtamaki" or "Group") is committed to conducting its business in accordance with the highest standards of ethics and compliance. Huhtamaki strictly prohibits and does not tolerate violations of any applicable laws or regulations, Huhtamaki Code of Conduct, other Huhtamaki policies or any other internally binding instructions in any form.

Huhtamaki strives for a business culture where everyone feels comfortable to seek advice, raise questions and speak up. At Huhtamaki, allegations of non-compliance are taken seriously and all steps necessary are taken to investigate and address raised concerns, regardless of the reporting channel.

The purpose of this Group Speak Up and Investigations Policy ("Policy") is to enhance group-wide understanding of how concerns about suspected or observed non-compliance shall be raised at Huhtamaki. In addition, this Policy sets forth principles for investigating and responding to alleged violations. This Policy sets a strict prohibition against any form of retaliation against a party who raises concern in good faith.

2 Scope

This Policy is applicable to all Huhtamaki companies and employees, members of the management, officers and directors ("employees"), as well as parties acting on Huhtamaki's behalf, such as agents and consultants. In addition, Huhtamaki's business partners and other external stakeholders are encouraged to report about suspected or observed instances of non-compliance in accordance with this Policy.

This Policy may be complemented with other documents and instructions containing more detailed guidance on how non-compliance incidents are investigated and how appropriate steps are taken to manage and address these matters at Huhtamaki.

Failure to comply with this Policy may result in disciplinary actions, including termination of employment.

3 Speaking up

3.1 Why speaking up is important

At Huhtamaki, we foster a culture of open dialogue and speak up when suspecting or observing non-compliance.

Open discussion culture is a key factor in preventing misconducts and violations from happening. Therefore, in case an employee is in doubt or needs advice, they are encouraged to raise questions and share concerns with their manager or over-manager, HR, Legal or directly with Global Ethics and Compliance.

Sometimes, despite preventive measures, misconduct and violations do happen. Everyone at Huhtamaki is encouraged to speak up when suspecting or observing instances of non-compliance. Speaking up is crucial so that Huhtamaki can investigate, address and correct all instances of non-compliance. Further, speaking up is seen as an important form of honesty and an integral part of Huhtamaki's culture of open dialogue.

Speaking up may also be referred to as whistleblowing, and a person reporting as a whistleblower.

3.2 Which channels to use for speaking up

At Huhtamaki, we offer channels for speaking up.

In case of suspected or observed non-compliance, employees shall promptly report the incident to their manager or over-manager, Legal or HR who will further inform Global Ethics and Compliance. Employees can always also contact Global Ethics and Compliance directly.

In case an employee feels that the matter cannot be reported through the mentioned channels, electronic Huhtamaki Speak Up channel can be used to raise concerns anonymously, confidentially and in employee's own language. Huhtamaki Speak Up channel can be also used by Huhtamaki's business partners or other external stakeholders. Electronic Huhtamaki Speak Up channel is maintained by Global Ethics and Compliance.

Additionally, Huhtamaki may have local electronic channels or methods for speaking up, as required by law or otherwise. This includes entity-specific channels in accordance with the applicable local legislation transposing Directive (EU) 2019/1937 of the European Parliament and of the Council. Huhtamaki Global Ethics and Compliance has an overall responsibility for Huhtamaki's channels for speaking up and the governance of these channels.

3.3 When to speak up

At Huhtamaki, the speak-up channels are used for instances of non-compliance.

Instances of non-compliance to be reported include misconduct, unethical behavior or violation of applicable laws and regulations, Huhtamaki Code of Conduct, other Huhtamaki policies or any other internally binding instructions.

Speak up channels are not intended for reporting general business concerns or operational issues, or emergency events presenting an immediate threat to life or property. Further, local HR should be contacted for concerns employees may have in relation to the terms of their employment or behavioral issues that should be managed through local grievance or other HR processes.

Speak up channels shall never be used for making false accusations. If the reported concern is, or includes, malicious or vexatious allegations, disciplinary actions may be taken against the employee reporting. If an employee makes a genuine allegation in good faith, no action will be taken against them although the allegation would not be confirmed by the investigation.

3.4 What happens after speaking up

At Huhtamaki, instances of non-compliance are investigated in accordance with our process.

Global Ethics and Compliance has the overall responsibility for investigations at Huhtamaki, globally. This includes authority to investigate suspected non-compliance incidents on all levels of the organization.

When receiving a report, Global Ethics and Compliance will promptly acknowledge the receipt and carefully assess each report. An investigation case will be opened always when a report contains a clear suspicion of wrongdoing and includes minimum actionable information or evidence needed to be able to investigate the reported non-compliance. If the initial report does not include enough information, the reporter will be contacted for more details.

For Huhtamaki internal purposes, the investigation cases are classified as core violations and other violations, and processed accordingly in accordance with internal guidelines. The classification guides e.g. how internal stakeholders will be informed and allocation of primary responsibility for investigative actions.

Investigative actions are selected on the case by cases basis, and may include e.g. document reviews, email reviews, background info checks and interviews. Both Huhtamaki internal and external resources may be utilized. Accessing employee's personal information, such as emails and other electronic correspondence, is subject to approval by General Counsel and always done in compliance with applicable regulations.

In the case of an allegation for non-compliance rises to the level of a potential human rights violation, the first priority is the safety and wellbeing of the affected individuals. Global Ethics and Compliance will inform the relevant stakeholders at Huhtamaki to secure that appropriate actions can be taken.

Investigatory steps taken, findings and conclusions will be documented. Possible preventative and corrective actions, including disciplinary actions, are determined based on the outcome of the investigation, and the investigation case is closed thereafter.

4 Governance and objectivity

At Huhtamaki, reported instances of non-compliance are investigated promptly, independently and objectively, and always in compliance with this Policy, internal guidelines as well as applicable laws and regulations.

Global Ethics and Compliance reports to the Investigations Council (the IC) that oversees and acts as the decision-making body for the investigations, including also determination of remedial and preventative actions and formal closure of the cases. The IC convenes regularly and as needed. The IC is chaired by Group General Counsel and the other members are Chief Financial Officer and Executive Vice President, Health and Safety. Global Ethics and Compliance has also a regular reporting line to Huhtamaki Board of Directors through its Audit Committee.

To secure objectivity, no-one is allowed to be involved in investigating or determining possible corrective actions in a case where they are the person subject to the investigation or involved in the confirmed non-compliance. Persons investigating the case are separate from the chain of

management involved in the matter and from those approving the corrective actions, including disciplinary actions.

In case a member of the Global Ethics and Compliance is personally involved in a reported non-compliance, the matter will be referred to the IC members for actions. In case an IC member is personally involved in a reported non-compliance, the objectivity of the investigation is ensured by excluding such member from handling the particular investigation.

5 Confidentiality and protection of persons speaking up in good faith

5.1 How we ensure confidentiality

All reports and investigations cases will be treated as highly confidential. Related information is shared only if required and on a need-to-know basis. All reasonable steps will be taken to maintain the anonymity of a person speaking up, where it is requested by the person.

Anonymous information is just as important to Huhtamaki as information that is disclosed with an identity. However, persons speaking up are encouraged to report with identity as this enhances more efficient and accurate investigation process.

Non-compliance instances involving criminal activity or other violation of law may result in the matter being reported to the appropriate authorities. In that case ability to maintain anonymity cannot be guaranteed and will be subject to applicable regulations. Further, in some countries the applicable regulations prohibit reporting certain matters anonymously.

5.2 How we enforce non-retaliation

At Huhtamaki, victimization of any individual speaking up is not tolerated. Any instances of possible retaliation will be taken seriously and investigated appropriately. Huhtamaki is committed to protecting all employees who have made reports in good faith and to making sure that they are protected from retaliation for their reports. This includes measures in accordance with applicable laws, such as laws transposing Directive (EU) 2019/1937 of the European Parliament and of the Council.

6 Roles and responsibilities

Each employee is responsible for acting in accordance with this Policy. Especially, employees are expected to report any suspected or observed non-compliance.

Leadership teams at global, segment and local level are responsible for ensuring that this Policy is fully implemented in their field of responsibility.

Global Ethics and Compliance has the overall responsibility for this Policy, channels for speaking up and investigations for non-compliance instances.

Investigations Council (the IC) oversees the investigations and acts as the decision-making body for the investigations, including also determination of remedial and preventative actions and formal closure of the cases.

7 Further information

Further information and instructions are available on Huhtamaki Hub. You may also contact Global Ethics and Compliance or Legal for further advice.