

## California Transparency in Supply Chains Act of 2010 Disclosure Statement

Huhtamaki Inc. (“Huhtamaki”) is committed to conducting business with honesty and integrity; in treating all people with dignity and respect and complying with all applicable laws, regulations and treaties.

Huhtamaki is also committed to protecting and promoting human rights. We do not tolerate illegal child labor or forced, involuntary labor. Huhtamaki respects the international principles of human rights, including but not limited to those that are outlined under the UN Declaration of Human Rights, the Trafficking Victims Protection Act as amended, and the California Transparency in Supply Chains Act of 2010. In addition, Huhtamaki’s approach reflects evolving global expectations regarding responsible sourcing, human rights due diligence, and forced labor prevention across supply chains.

These commitments are embodied in our Huhtamaki Global Code of Conduct, the Code of Conduct for Huhtamaki Suppliers, the Huhtamaki US Employee Handbooks and our General Terms and Conditions of Purchasing. Huhtamaki has established and maintains a Huhtamaki Global Human Rights Policy and a Huhtamaki Human Trafficking and Modern Day Slavery Statement to our policies, both of which are published on the global website and are regularly reviewed and updated to reflect current best practices and legal requirements.

We comply with employment laws of every country in which we operate and expect those with whom we do business to do the same. The Code of Conduct for Huhtamaki Suppliers is incorporated in the obligations by our suppliers by our Standard Terms and Conditions of Purchasing, wherein a link is provided to the latest version of the Code of Conduct for Huhtamaki Suppliers. Furthermore, a link to the Standard Terms and Conditions of Purchasing is printed on the front of each Huhtamaki North America Purchase Order. The acceptance of the Purchase Order constitutes an agreement to adhere to the latest version of the Terms and Conditions of Purchasing and the Code of Conduct for Huhtamaki Suppliers. We will continue to incorporate these Standard Terms and Conditions of Purchasing into our supply contracts and confirm with our suppliers that we apply these standards to them, as well as ourselves. The latest versions of the Terms and Conditions of Purchasing and the Code of Conduct for Huhtamaki Suppliers are accessible on our website. Huhtamaki periodically reviews and updates these standards, and expects suppliers to remain aligned with revisions as they occur.

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires retailer sellers and manufacturers conducting business in California, to disclose their commitment to address the issue of forced labor and human trafficking.

Accordingly, the Act requires Huhtamaki to disclose, at a minimum, the following:

### **Verification**

Huhtamaki routinely assesses risk related to its supply chain. This assessment is based primarily upon supplier quality performance, the type of transaction, commodity purchased, the geographical location of the supplier and other relevant business and legal criteria. The Code of Conduct for Huhtamaki Suppliers specifically identifies the expectation that our suppliers must comply with laws governing human trafficking and slavery and reserves Huhtamaki’s right to monitor activities to confirm compliance. Huhtamaki has enhanced this evaluation process through a risk-based due diligence approach that incorporates both internal review and external information sources, where appropriate to identify and prioritize potential risks.

For which purpose, Huhtamaki regularly asks key suppliers to self-certify their acceptance and compliance with the principles in the Code of Conduct for Huhtamaki Suppliers (either in a formal contract and/or a Code of Conduct for Huhtamaki Suppliers certification form). Huhtamaki may conduct semi-announced visits or have third party auditors monitored visits to ensure compliance with the Code of Conduct for Huhtamaki Suppliers, including compliance with human rights and prohibition on slavery and other third-party certification criteria (e.g. FSC for fiber sources).

## Audit

Huhtamaki has audit rights in many of its supply contracts and in the Code of Conduct for Huhtamaki Suppliers, each of which permits Huhtamaki to audit a supplier's compliance with the terms of the contract and said Code. Huhtamaki conducts routine audits of supplier performance, including intentional and systematic assessments of compliance with human trafficking and slavery prohibitions as outlined in the Code of Conduct for Huhtamaki Suppliers.

As part of our developing supply chain due diligence, Huhtamaki now is developing audit protocols, including scheduled audits for high-risk suppliers, as well as individual audits of suppliers identified through our processes and procedures. Audits may be announced or semi-announced depending on circumstances and risk profile. These practices increasingly incorporate consideration of human rights, forced labor, and modern slavery risks for suppliers identified as higher risk through due diligence processes.

Currently, Huhtamaki North America business segment is using third-party due diligence platforms RISKRATE, provided by NAVEX for reputational screenings and beginning to conduct SMETA audits for certain environmental and social issue screenings. This review of suppliers is conducted in accordance with a risk-based evaluation of such suppliers, with particular emphasis on high-risk jurisdictions and commodity categories. In the event of non-compliance, Huhtamaki will investigate the matter and take the appropriate actions to mitigate the risk by either terminating the supplier relationship or remediating the risk to ensure the supplier is following the Code of Conduct for Huhtamaki Suppliers and our business practices.

In the event of non-compliance with human trafficking and slavery prohibitions, Huhtamaki will conduct a thorough investigation and provide the supplier with a reasonable opportunity to remediate, unless the violation is severe or involves criminal conduct. Huhtamaki reserves the right to immediately terminate the supplier relationship if remediation efforts are unsuccessful or if the violation involves forced labor, child labor, or human trafficking. All remediation efforts and outcomes are documented and monitored for effectiveness.

## Certifications

Huhtamaki contracts with suppliers require suppliers to comply with all laws. Our supplier will also be required to adhere to the Code of Conduct for Huhtamaki Suppliers, which states our expectations of compliance with laws and ethical business conduct, including those laws and principles prohibiting involvement in human trafficking and slavery. Using the RISKRATE platform, Huhtamaki North America business segment requires acknowledgement or certification by key suppliers to the Code of Conduct for Huhtamaki Suppliers. Other than these contractual obligations, the RISKRATE survey for certification and Huhtamaki's right to monitor, Huhtamaki does not have a formal supplier certification process. Certain suppliers may be required to provide certifications, acknowledgements, or other confirmations evidencing compliance with these requirements, depending on risk and supplier category.

## Internal Accountability

Huhtamaki employees are, under the terms of employment, expected to follow all laws and all Huhtamaki policies, including the Huhtamaki Global Code of Conduct. Employees who violate the Huhtamaki Code of Conduct or any Huhtamaki employment policies are subject to disciplinary action, up to and including discharge.

Employees are encouraged to report any and all violations of the Code of Conduct or other employment policies to their managers, an officer of the company or to the Human Resources department. Employees, suppliers and customers may utilize our company-wide anonymous hotline to report questionable behavior or actions. In the event of non-compliance with human trafficking and slavery prohibitions, Huhtamaki will conduct a thorough investigation and provide the supplier with a reasonable opportunity to remediate, unless the violation is severe or involves criminal conduct. Huhtamaki reserves the right to immediately terminate the supplier relationship if remediation efforts are unsuccessful or if the violation involves forced labor, child labor, or human trafficking. All remediation efforts and outcomes are documented and monitored for effectiveness.

## Training and Awareness.

Huhtamaki provides all employees regular training regarding compliance with the Huhtamaki Code of Conduct, the standards of ethical behavior, policies, procedures and legal requirements that define the way we do business. Huhtamaki North America business segment Supply Chain and sourcing personnel received specialized, mandatory training on human trafficking and slavery risks, supply chain due diligence, and mitigation strategies. This training is conducted at least annually and is tailored to the specific roles and responsibilities of supply chain personnel. Huhtamaki is committed to continuously enhancing and expanding the scope of supply chain and sourcing employee compliance training.

## Continuous Improvement and Transparency

Huhtamaki is committed to the ongoing development and enhancement of its supply chain due diligence practices. Huhtamaki regularly evaluates the effectiveness of its human trafficking and slavery prevention measures and adjusts its policies, procedures, and audit protocols accordingly. Huhtamaki welcomes stakeholder feedback and engages with industry organizations, non-governmental organizations, and government agencies to stay informed of emerging risks and best practices in supply chain transparency and human rights protection.