HUHTAMAKI INDIA LIMITED

WHISTLE BLOWING POLICY

NAME OF THE POLICY	**HUHTAMAKI INDIA LIMITED – WHISTLE BLOWING POLICY**
EFFECTIVE DATE	February 11, 2022 (Supersedes the Whistle Blower Policy approved by the Board of Directors of Huhtamaki India Limited on December 29, 2014)

1. BACKGROUND AND PURPOSE

1.1 Huhtamaki India Limited ("Huhtamaki" or "Company") believes in the conduct of its affairs in a fair and transparent manner by adopting the highest standards of professionalism, integrity and ethical behaviour.

1.2 Huhtamaki designed its Code of Conduct ("Code") with a view to prescribe standards of ethical behaviour expected of all employees across all levels and members of the management (including directors) ("Employees") whenever they act on behalf of Huhtamaki. The Code sets out:

(i) Minimum standards of behaviour and conduct expected of Employees.

(ii) Expectation that every Employee will comply with Huhtamaki Policies.

(iii) Expectation that every Employee will comply with all laws and regulations, as applicable.

(iv) The Code of Conduct of Huhtamaki can be accessed at: https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/.

Indian law requires every public listed company to establish a vigil mechanism / whistle blowing mechanism to encourage Employees to report genuine concerns / grievances. Accordingly, this Policy is designed to provide a framework for Employees to report genuine concerns / grievances.

2. HOW SHOULD VIOLATIONS BE REPORTED?

2.1 If an Employee becomes aware that another Employee may have violated the Code, any other Policy of Huhtamaki or any law or regulation, the Employee is expected to report the purported violation to any person mentioned below, at their discretion. Examples of violations could include known or suspected theft, accounting or auditing improprieties, other financial misconduct, bribery, kickbacks, harassment, discrimination, threatening violence, substance abuse, unsafe workplace or any other types of misconduct involving Huhtamaki, its assets or its employees.

(i) Their Line Manager.

An Employee may report any purported Violation to their manager by email or alternatively, by letter addressed to the place where the line manager is normally seated and marked 'Confidential'. The line manager will inform the India Investigation Lead as soon as possible but, in any event, not later than three (3) business days of receipt of a complaint.

(ii) Manager's Manager.

An Employee may, at their discretion, report any purported Violation to their Manager's Manager by email or alternatively, by letter addressed to the place where the manager's manager is normally seated and marked 'Confidential'. The manager's manager will inform the India Investigation Lead as soon as possible but, in any event, not later than three (3) business days of receipt of a complaint.

(iii) Head of Human Resources, Huhtamaki.

An Employee may, at their discretion, report any purported violation to the Head of Human Resources, India by email. Alternatively, an Employee may address a letter to the Head of Human Resources, marked 'Confidential', at the registered office of the Company. The Head of Human Resources will inform the India Investigation Lead as soon as possible but, in any event, not later than three (3) business days of receipt of a complaint.

(iv) India Investigation Lead.

An Employee may choose to report any purported violation to the India Investigation Lead at IndiaInvestigationLead@huhtamaki.com. Alternatively, an Employee may address a letter to the India Investigation Lead marked 'Confidential', at the registered office of the Company.

(v) Audit Committee Chairperson.

An Employee may choose to report any purported violation to the Chairperson of the Audit Committee at india auditcommitteechairperson@huhtamaki.com, especially where the purported violation relates to any matter that is in the nature of manipulation of company data/records, financial irregularities including fraud or suspected fraud, bribery, kickback, criminal offence, wastage/misappropriation of company funds/assets, breach of Code of Conduct or any matter that is within the scope of the Audit Committee.

(vi) Global Compliance.

An Employee may choose to report any purported violation to Global Compliance at global.compliance@huhtamaki.com.

(vii) Speak Up Channel.

Huhtamaki Speak Up channel enables reporting through web-based system either by name, or anonymously if allowed by local laws and regulations. In some countries reporting is also possible through voicemail. All reports made will be promptly forwarded to Global Compliance who will coordinate the investigation process. Huhtamaki Speak Up channel can be accessed by visiting the website: https://report.whistleb.com/Huhtamaki. Employees are encouraged to use the Speak Up Channel for submitting their complaints. Alternatively, a complaint may be made by voicemail in India at the following numbers: (a) If in English: 000800-1009230, code 5239; or (b) if in Hindi: 000800-1004073, code 5239.

Complaints may also be made verbally to any person above, who will then reduce the complaint to writing, share the written complaint with the complainant and the India Investigation Lead expeditiously. If a complaint is received by anyone other than those mentioned above, they will promptly forward the complaint to the India Investigation Lead.

3. STANDARD OPERATING PROCEDURE FOR INVESTIGATIONS

The manner of recording complaints received, Roles and Responsibilities of multiple stakeholders involved in enforcement of Huhtamaki's Code of Conduct, Investigation Process, Reporting and Disclosure norms are set out in detail in the Standard Operating Procedure Upon Receipt of Whistle Blowing Complaints in India.

4. PRIVACY AND PROTECTION OF EMPLOYEES CONCERNED

4.1 The name and identity of an Employee making the complaint will be kept strictly confidential and only persons who absolutely need to know, in order to perform their duties, will have access to the name and identity of the Employee concerned.

4.2 The name and identity of the Employee(s) against whom a complaint has been made, will also be kept confidential. Every Employee is expected to participate and cooperate in any investigation of reported violation. Investigators will not, to the extent practical and appropriate under the circumstances to protect the privacy of the persons involved, disclose the identity of anyone who reports a suspected violation or who participates in the investigation. Investigators and anyone assisting them are required to act in the best interests of Huhtamaki and not in the interest of any single employee. As soon as investigation has been completed, necessary disciplinary actions will be taken against an Employee found guilty of a violation. Violations may also result in criminal and civil sanctions as well as termination of employment, in appropriate cases.

4.3 Strict action will be taken against any Employee (whether it is the complainant or the investigating team or an Employee against whom the complaint is made or any Employee who is investigated as part of this process) violating their confidentiality obligations.

5. ZERO TOLERANCE TO RETALIATION

5.1 The Company, as a policy, condemns any kind of retaliation, discrimination, harassment, victimization or any other unfair employment practice being adopted against a complainant. Strict action (including but not limited to termination) will be taken against anyone found indulging in such practices. Huhtamaki will protect the interests of Employees preferring a complaint in good faith.