

# Code of Conduct for Huhtamaki Suppliers

**Huhtamaki**

Date of issuance: September 2015  
Version: 3.0 | Version created: November 20, 2023  
Approved by the Global Executive Team  
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At Huhtamaki, our ambition is to be the first choice for sustainable packaging solutions globally. We are always guided by our values – Care, Dare, Deliver – forming the core of our culture and way of working.

Consistent with our values, we are committed to conducting business in a way that complies with applicable laws and regulations and standards of ethical business conduct, and respects human rights and the environment.

This Code of Conduct for Huhtamaki Suppliers (“Code”) applies to all business partners providing goods or services to us (“You”) and is an integral part of our business relationship. It outlines the minimum standards of ethical business conduct and social and environmental responsibility<sup>1</sup> we expect our partners to comply with, as well as expectations to develop appropriate control systems, permit third party verification, and address non-compliances.



## **Care**

We care for the planet, people, customers and partners.



## **Dare**

We dare to innovate, grow and have an impact on the future.



## **Deliver**

We deliver our promises, with integrity and as a team.

# Standards

## SOCIAL

### Health and Safety

- You provide workers with a safe and healthy work environment in accordance with the law
- You take measures to prevent workplace hazards, including implementing appropriate systems and work procedures
- You provide workers training and personal protective equipment, as well as medical care in case of injury
- You ensure that employer-provided housing, transportation and food are sanitary and safe

### No harassment or abuse

- You treat all workers with respect and dignity, and do not tolerate any form of physical, sexual, or verbal harassment, actual or threatened violence, bullying, intimidation, or other inappropriate behavior

### No discrimination

- You are committed to providing equal opportunities and do not tolerate discrimination in any form. An individual's or group's access to opportunities are not limited by characteristics such as race, color, caste, national origin, religion, age, disability, gender, veteran status, marital or domestic partner status, family relationship, sexual orientation, citizenship, union membership, political affiliation or other similar characteristics
- You apply this to all aspects of employment decisions

### No forced labor

- Under no circumstances will You use forced or involuntary labor, including compulsory or trafficked labor, indentured labor, bonded labor, prison labor, or other forms of mental or physical coercion
- You, or any labor intermediary used by you,

do not retain workers' passports or other identification documents, require workers to pay fees or deposits in exchange for work, withhold pay, or otherwise constrain a worker's freedom of movement

### No child labor

- You do not employ children under the age of 15, unless exceptions recognized by the ILO apply
- You do not permit those under the age of 18 to do work that can jeopardize their physical or psychological health or development, or interfere with school
- You take reasonable precautionary measures to verify the age and identity of workers

### Reasonable working hours

- You will not require workers to work more than the regular and overtime hours allowed by local laws and regulations

- You ensure that workers are provided with at least 1 day of rest after 6 consecutive days of work

### Fair and timely compensation

- You compensate all workers with wages, overtime premiums and benefits that meet or exceed legal requirements or collective agreements, whichever are higher
- You pay salaries on time and in full, with only legal deductions

### Freedom of Association

- You respect the right of workers to form, join, or not join labor unions
- You are committed to bargaining in good faith and establishing a constructive dialogue with legally recognized workers' representatives
- You provide other means of dialogue in locations where freedom of association is restricted

## ENVIRONMENT

### Compliance with applicable laws

- You ensure that every manufacturing facility complies with all applicable environmental laws and regulations, particularly concerning air emissions, water use and discharge, and waste disposal
- You hold all legal permits necessary for Your operations and comply with such permits

### Minimizing impact

- You make efforts to reduce the environmental impacts of Your operations and safeguard the natural resources on which we all depend. Reducing the environmental impacts covers topics such as raw material, energy and water use, pollution prevention, and waste management
- You strive to reduce greenhouse gas emissions from your own operations and value chain
- You do not source materials, directly or indirectly, that contribute to deforestation of high conservation value areas, or interfere with the habitats of endangered species

## BUSINESS ETHICS

### Compliance with laws

- You comply with all applicable laws and regulations

### No corruption

- You do not engage in any type of corrupt practices such as offering, promising or accepting bribery, kickbacks or facilitation payments
- You do not offer gifts, business hospitality or any other benefits which may inappropriately influence decision-making

### Avoid conflict of interest

- You avoid conflicts of interest in all forms
- You will declare to Huhtamäki any potential or existing conflicts of interest regarding Your relationship with Huhtamäki

### Fair competition

- You compete fairly, and comply with applicable anti-trust and competition laws and regulations

### Trade sanctions compliance, anti-money laundering

- You comply with applicable trade sanction regulations, such as trade embargoes, sanctions on parties and geographical areas, and import and export regulations
- You do not participate in money laundering, tax evasion, or financing of terrorist, or criminal activities
- You keep accurate and transparent records of business transactions

### Respect of confidentiality, intellectual property and privacy

- You ensure the confidentiality and security of non-public information of Huhtamäki
- You respect the intellectual property of others
- You respect privacy, and collect and process personal data only in compliance with applicable laws and regulations
- You follow all applicable restrictions and prohibitions regarding insider information and insider trading considering that Huhtamäki Oyj is listed on Nasdaq Helsinki Ltd.

### Product quality requirements

- You meet all product and service specifications, and quality and safety requirements as required by law or contract
- You use material of known origin and ensure traceability of raw materials and finished goods.



# Compliance with this Code

## Management systems

You are expected to implement appropriate systems and controls to comply with the standards in this Code. This includes:

- Having appropriate policies, procedures and implementation plans
- Conducting management and worker trainings
- Having monitoring, auditing and corrective action practices in place
- You maintain all documentation needed to demonstrate compliance with applicable laws and regulations, and this Code.

## Functioning grievance mechanisms

You offer ways for workers to file a complaint or lodge a concern without retaliation.

Workers can expect that their concerns are handled impartially and with appropriate discretion. You ensure that workers are aware of the standards laid out in this Code. You inform workers that they can report concerns related to this Code through the Huhtamaki Speak Up channel

## Subcontractors and suppliers

You apply these or similar standards to Your subcontractors and suppliers. Written confirmation from Your subcontractor demonstrating compliance with this Code will be provided upon request.

## Providing access to monitor

Huhtamaki reserves the right to assess and

monitor compliance with this Code and may include completing a self-assessment, providing validating documentation, site visits or audits, or other activities. We may do so directly or with the use of third parties. Huhtamaki shall treat all information received during any audits confidentially.

## Non-compliance with this Code

We expect that suppliers who are not in compliance with this Code shall promptly implement any corrective actions, communicating plans and timelines when requested, and seek assistance from Huhtamaki or another third party if necessary. Suppliers who fail to act may be terminated and/or precluded from consideration of future business.

# Reporting misconduct

## Open communication

We value transparency with our suppliers, and expect You to report actual or suspected non-compliances of this Code to Huhtamaki without delay.

## Huhtamaki Speak Up

Any individual who suspects a violation of this Code may make a report directly to Huhtamaki through the Huhtamaki Speak Up channel at <https://report.whistleb.com/en/Huhtamaki>

<sup>1</sup> These standards are consistent with international principles and frameworks such as the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

# Compliance with this Code

On behalf of \_\_\_\_\_ (organization name),

I confirm our agreement to comply with the standards set out in the Code of Conduct for Huhtamaki Suppliers

Name \_\_\_\_\_

Title \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_