



## 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 the California Transparency in Supply Chains Act of 2010. These commitments are embodied in our Huhtamaki Global Code of Conduct, the Huhtamaki Global Supplier Code of Conduct, the Huhtamaki US Employee Handbooks and our General Terms and Conditions of Purchasing.

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 Huhtamaki Global Supplier Code of Conduct 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 Supplier Code of Conduct. Furthermore, a link to the Standard Terms and Conditions of Purchasing is printed on the front of each Huhtamaki 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 Supplier Code of Conduct. 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 Supplier Code of Conduct are accessible on our website.

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 Huhtamaki Supplier Code of Conduct 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. Other than the foregoing, there is no formal process for verification of product supply chain to evaluate and address risks of human trafficking and slavery.

## Audit

Huhtamaki has audit rights in many of its supply contracts and in the Huhtamaki Global Supplier Code of Conduct, each of which permits Huhtamaki to audit a supplier's compliance with the terms of the contract and said Code. While Huhtamaki has certain contractual rights to audit its suppliers and has conducted routine audits of supplier performance, those audits do not currently include intentional assessments of human trafficking and slavery.

## Certifications

Huhtamaki contracts with suppliers require suppliers to comply with all laws. Our supplier will also be required to adhere to the Huhtamaki Global Supplier Code of Conduct, which states our expectations of compliance with laws and ethical business conduct, including those laws and principles prohibiting involvement in human trafficking and slavery. Other than these contractual obligations and Huhtamaki's right to monitor, Huhtamaki does not have a formal supplier certification process.

## 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 may utilize our company-wide anonymous hotline to report questionable behavior or actions.

## Training and Awareness.

Huhtamaki provides all employees regular training regarding compliance with the Huhtamaki Code of Conduct and its employment policies. We will specifically enhance the training of supply chain and sourcing employees on human trafficking and slavery, particular with respect to mitigating risks within supply chains.