

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. 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. In 2017, Huhtamaki added both the Huhtamaki Global Human Rights Policy and the Huhtamaki Human Trafficking and Modern Day Slavery Statement to our policies, both of which are published on the global website.

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.

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.

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. While Huhtamaki has certain contractual rights to audit its suppliers and has conducted routine audits of supplier performance, those audits do not routinely include intentional assessments of human trafficking and slavery. 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.

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 will be done in accordance with a risk-based evaluation of such suppliers. 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.

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.

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.

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. We have also specifically trained our Huhtamaki North America business segment Supply Chain and

its sourcing directors, managers, and employees on human trafficking and slavery, particularly on mitigating risks within this supply chain. We will continue to specifically enhance the training of supply chain and sourcing employees.