

Human Rights Policy

1. Purpose

This policy explains Elopak's commitment to respecting human rights and our approach to managing human rights risks arising from Elopak's activities and business relationships.

2. Commitment

We respect and support internationally recognized human rights and labor standards, including those outlined in *the International Bill of Human Rights* and *the ILO Declaration on Fundamental Principles and Rights at Work* (Core Labor Standards), and we strive to positively impact our business partners and the communities where we operate.

Our approach for working with human rights is based on *the UN Guiding Principles on Business and Human Rights* and the *OECD Due Diligence Guidelines for Responsible Business Conduct*.

This policy is anchored in our commitment to respecting human rights as set out in our Code of Conduct, which we expect all employees to comply with. Elopak employees are also provided with human rights training to enable them to act in accordance with our Code of Conduct and this policy. Elopak's commitment to human rights is further embedded in our internal policies and procedures, such as our Business Partner Procedure (including integrity due diligence process and country risk assessment), Anti-Corruption Policy, Safety Standard, and Privacy Statement. Our Supplier Code of Conduct also includes a set of minimum requirements on human and labor rights.

3. Implementation

In Elopak, we focus on the human rights areas where the risks for negative impact on people in our operations, supply chain and business relationships are the highest. We manage human rights as follows:

- Our global compliance program is risk-based and designed to prevent, detect, and respond to compliance and business integrity risks, including human rights risks.
- Human rights risk assessments are conducted on a continuous basis. Human rights impacts are monitored, and mitigating action plans proposed where needed.
- In the event human rights violations are detected, remedy measures shall be put in place.
- Integrity due diligence is conducted for new and existing customers, suppliers, and other business partners, such as joint venture partners or third-party representatives. Prior to major projects or expansion opportunities being initiated, we aim to conduct assessments to evaluate the risk of any potential negative impact on people.
- Third-party ethical audits are conducted where deemed necessary (high risks).
- Elopak's Whistleblowing Helpline allows employees and external stakeholders to report concerns, incidents, breaches and/or suspected breaches of our Code of Conduct, other internal policies, and/or laws and regulations.

4. Governance

This policy has been approved by the executive management team. Ethics and compliance matters, including human rights, are regularly discussed with management and twice a year formally reported on to the Board Audit and Sustainability Committee. Group Legal & Compliance is the owner of this policy. The Ethics & Compliance Council has a responsibility to manage and coordinate human rights risks, along with other ethics and compliance risk areas, and facilitate an efficient implementation across the organization.

5. References

- Code of Conduct
- Global Supplier Code of Conduct
- General Terms and Conditions of Purchase (GTCs)
- Business Partner Procedure
- Anti-Corruption Policy
- Safety Standard
- Privacy Statement

6. History

Created date: 20.12.2022

Created by: Chief Legal & Compliance Officer

Revised date: 10.01.2023

Revised by: CFO

Created / Modified	Approved by / Date
Date: 20.12.2022	Date: 18.01.2023
Name: Elisabet Døsen Grohshennig	Name: Thomas Körmendi
Position: Chief Legal & Compliance Officer	Position: CEO
Responsible Department: Finance & IT	