



Tetra Pak Code of Business Conduct for Suppliers

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Introduction.

Tetra Pak is committed to conducting every aspect of its business with integrity. Our promise is Protects What's Good: food, people and the planet. Our value chain suppliers are fundamental to realising this mission and we recognise that we have an important obligation to engage collaboratively with our suppliers and other partners to secure responsible practices.

Our Code of Business Conduct for Suppliers is a fundamental part of our approach to human rights and environmental due diligence (HREDD) and defines what we expect of you, as a supplier to Tetra Pak. Our experience working with our Code has shown us that when we take action to protect food, people and the planet, workers are more productive, resources are utilised more efficiently, and business thrives.

How is the Code structured?

The Code of Business Conduct for Suppliers is structured into 15 Fundamental Principles, which each contain a set of criteria. We recognise that the Fundamental Principles are increasingly interconnected and interdependent and therefore you need to consider them together to meet the criteria.

The criteria are divided into:

M Must (M) criteria: Criteria that are binding and which suppliers need to comply with in order to conduct business with Tetra Pak.

GP Good Practice (GP) criteria: Criteria that are non-binding but which we expect you to work towards implementing. While, today, we view these criteria as good practice, we anticipate these may become mandatory with future versions of this Code.

Tetra Pak establishes additional standards for the sourcing of materials that have clear risks to people and the environment and have a significant impact on the Tetra Pak business, for example, liquid packaging board and renewable polymers. For further information, please refer to the Tetra Pak website.

Who is included in scope of the Code?

Suppliers in scope of this Code include any third party that provides goods or services directly to Tetra Pak, including where the goods or services are provided by a parent, subsidiary or affiliate entity to the contracting party.

The criteria in the Code apply to all workers, including your own employees and any contingent workers, which you directly or indirectly hire through subcontractors or labour providers (for example, contract workers for manufacturing, security, catering, janitorial and other services). In the case of contingent workforce, the Must criteria may be applied through setting equivalent supply chain requirements to those in this Code.

Particular attention should be paid to the rights of individuals that may be at heightened risk in specific contexts, including but not limited to women, migrants and contract workers.

What is the basis for the Code?

The criteria contained within this Code are based on internationally recognised standards and principles, as well as the Tetra Laval Group Code of Business Conduct.¹

Tetra Pak is committed to implementing the UN Guiding Principles on Business and Human Rights.² As such, we respect all internationally recognised human rights, specifically those expressed in the International Bill of Human Rights³ and the principles and standards set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.⁴

In relation to our raw material sourcing, we uphold the United Nations Declaration on the Rights of Indigenous Peoples.⁵ We also support the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct⁶ and align with relevant industry standards such as the Ethical Trade Initiative (ETI) Base Code.⁷

What do we expect from you?

By committing to meet our Code of Business Conduct for Suppliers, you agree to secure the following:

- **Responsibility:** You are **required to comply** at all times with applicable laws, as well as with all Must criteria, which are based on international standards. Upon receipt of this Code, we expect you to review your current policies, procedures and ways of working against the Must criteria to ensure you are compliant. While non-binding, you are also **expected to work towards implementing** Good Practice criteria following acceptance of this Code.

Should one of the Must criteria contained in this Code *differ from* local laws or regulations (e.g. working hours), whichever is the higher standard applies. In cases where applicable laws *prevent* you from upholding the criteria (e.g. freedom of association), you are expected, to the best of your ability, to find alternative ways to respect the spirit of the criteria and to inform us accordingly.

- **Openness:** You are honest about areas that require improvement and communicate openly with Tetra Pak in case you identify a significant adverse impact in your operations or supply chain – see *Informing us in case of an impact* for further details.
- **Continuous improvement:** We recognise the time and effort required to implement our criteria and encourage you to adopt a continuous improvement mindset, to strengthen performance and go beyond minimum compliance.

What can you expect from us?

We strive to take a fair and open approach in how we work with you.

- **Dialogue:** We maintain open lines of communication with all our suppliers and welcome any feedback you may have on our performance or behaviour.
- **Support:** Where required and reasonable, we endeavour to support you to implement the criteria and assist you with your human rights and environmental due diligence efforts.
- **Fairness:** We will engage with you transparently, honour our commitments and take steps to ensure that our purchasing practices are responsible.

How do we monitor compliance?

As part of our approach to human rights and environmental due diligence, we monitor compliance through different methods, including dialogue with you, either through regular top-to-top meetings or through direct engagement on sustainability topics. We also reserve the right to verify that suppliers are in compliance with this Code through assessments and/or audits, including worker voice and human rights impact assessments. Third parties may be used to conduct these activities. You are expected to help facilitate such activities and refrain from retaliation in connection to or as a result of any findings. Any identified areas of non-compliance with the Code are expected to be corrected in a timely manner.

Where we are made aware of allegations and issues, we will engage with you to investigate and/or remediate them constructively. You are expected to collaborate with us and provide us with reasonable assistance to the extent required for Tetra Pak to fulfil our due diligence and legal reporting obligations.

We are willing to collaborate with those suppliers that want to advance their respect for food, people, and planet, and that acknowledge their impacts and seek to reasonably address them. However, where suppliers show a consistent or significant lack of commitment to compliance with the Must criteria set out in this Code, we reserve the right to end the relationship and terminate relevant agreements.

How do we secure confidentiality?

Co-operation, mutual trust and respect between Tetra Pak and suppliers are the foundation of successful implementation of the Code of Business Conduct for Suppliers. All communication received from you and/or shared via third-party platforms is treated confidentially by Tetra Pak.

Applicability

Note that some criteria may be deemed not applicable based on your setup or the products or services that you deliver to Tetra Pak. For example, where you do not provide materials or parts intended for use in contact with food (criterion 4.1) or no housing is provided to workers (criterion 10.7).

Translations

The official language of the Code of Business Conduct for Suppliers is English. Translations of the Code are provided for information purposes only and cannot be relied upon as contractual documentation. The English version is the sole contractual document and prevails in case of ambiguities or discrepancies.

Updates

We acknowledge that our suppliers operate within diverse legal frameworks and environments, and there is a need to monitor and continuously improve our approach to responsible sourcing. As such, this Code will be reviewed on a regular basis and when necessary (for example in line with regulation).

Fundamental Principles.

Business integrity, due diligence, and management systems

1. Business integrity and legal compliance



2. Human rights and environmental due diligence



3. Effective management systems



Food

4. Food safety compliance



People

5. Work is freely agreed



6. Freedom of association



7. Freedom from discrimination and harassment



8. Grievance channels and remedy



9. Wages and working hours



10. Occupational health and safety (OHS)



11. Land rights



12. Children's rights



Planet

13. Environmental management



14. Climate and nature impacts



15. Resource traceability and circularity



Business integrity, due diligence and management systems.

1. Business integrity and legal compliance

Compliance with applicable laws

- 1.1** All applicable laws and regulations are complied with and required permits are obtained.



Anti-bribery & corruption

- 1.2** All forms of corruption are prohibited and prevented.



Conflicts of interest

- 1.3** All business transactions are free from conflicts of interest. Any material ownership or beneficial interest in your company by a public official, representative of a political party, Tetra Pak employee or their relatives is declared to Tetra Pak.



Information safeguarding

- 1.4** Confidential information and trade secrets are safeguarded and measures to protect sensitive data from unauthorised access are implemented.



Product sourcing and manufacturing (conflict minerals)

- 1.5** Where applicable, actions are in place to identify, assess and mitigate the risk of minerals coming from conflict-affected or high-risk areas, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.⁸



2. Human rights and environmental due diligence

Human rights and environmental due diligence

- 2.1** Human rights and environmental due diligence is performed to identify, prevent, mitigate and account for potential adverse impacts on people and the environment in your own operations and in your supply chain, proportional to the size of the business and the severity of the human rights and environmental impacts. This is in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business & Human Rights.⁹



3. Effective management systems

Documentation management

- 3.1** Records are created and maintained to ensure regulatory compliance and conformity to the criteria in this Code. Records relating to the use of on-site sub-contractors are also maintained.



Sustainable procurement

- 3.2** Suppliers or sub-contractors that you use to provide goods or services to Tetra Pak are expected to meet equivalent requirements to the Must criteria in this Code.



Policies and procedures

- 3.3** Where necessary, policies and procedures are in place to support compliance with this Code.



Regulation monitoring

- 3.4** A system is in place to keep up to date with relevant regulation and adopt measures to secure compliance.

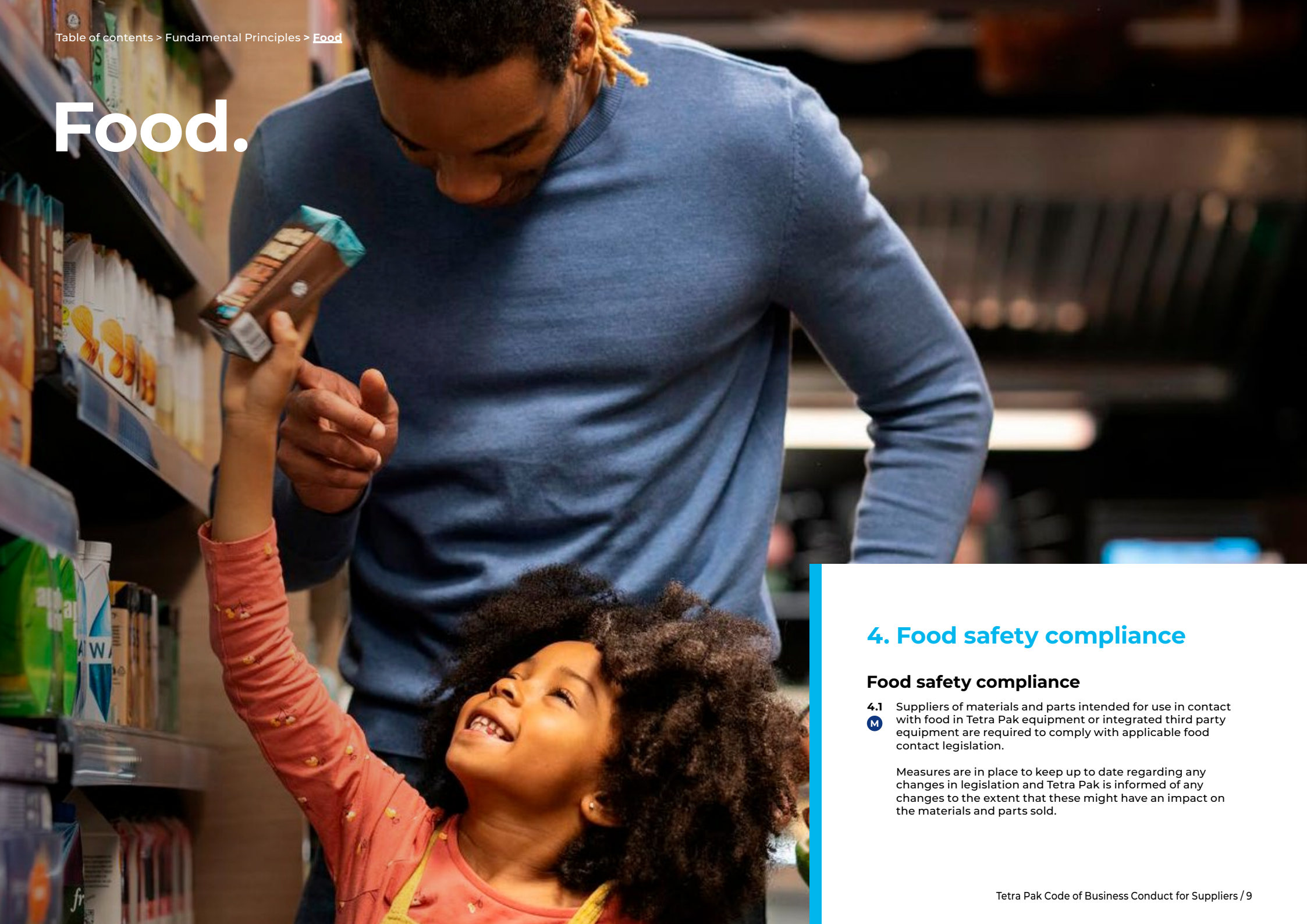


Competence development

- 3.5** Where necessary, training is provided to workers to ensure they understand their rights as workers, the functioning and accessibility of available grievance channels, and to support them, other staff members and management teams in meeting the criteria contained in this Code.



Food.



4. Food safety compliance

Food safety compliance

4.1 Suppliers of materials and parts intended for use in contact with food in Tetra Pak equipment or integrated third party equipment are required to comply with applicable food contact legislation.

Measures are in place to keep up to date regarding any changes in legislation and Tetra Pak is informed of any changes to the extent that these might have an impact on the materials and parts sold.

People.

5. Work is freely agreed

Forced labour

- 5.1** There is no trafficked, indentured or bonded labour, nor prison labour or any other form of labour involving mental and/or physical coercion. **M**

Freedom of movement

- 5.2** Workers have freedom of movement and are not confined to the premises, including dormitories, or provided housings. **M**
- 5.3** The use of surveillance for the purpose of intimidation or control of workers is not permitted. **M**

Responsible recruitment and employment

- 5.4** Fees and costs related to recruitment, employment or termination processes (as per the ILO definition¹⁰) are not charged to workers. Where workers have paid recruitment fees or costs, workers must be repaid **M**
- 5.5** Employers do not charge deposits, withhold or delay payments or implement any financial scheme that limits the worker's ability to leave employment freely. Workers are not required to give up identity papers, passports, or work permits as a condition of employment. **M**
- 5.6** Workers sign a written employment contract or equivalent before they start work or introductory training. Workers receive a copy of the contract, in a language they understand, prior to signature. Significant changes in employment terms are agreed upon by the worker in writing. **M**
- 5.7** A fair disciplinary policy is in place and communicated to all workers. **M**
- 5.8** Employment relationships are voluntary and based on mutual consent. Workers are allowed to resign at the end of their contract or at any time, without payment of a penalty. **M**

6. Freedom of association

Freedom of association

- 6.1** Workers are free to exercise their right to form or participate in work-related associations, including labour unions, professional organisations, and other relevant groups. Workers are free to engage in collective bargaining, seek representation and/or join workers' councils. These rights are exercised without fear of discrimination, violence or harassment, whether physical or psychological. **M**

7. Freedom from discrimination and harassment

Non-discrimination

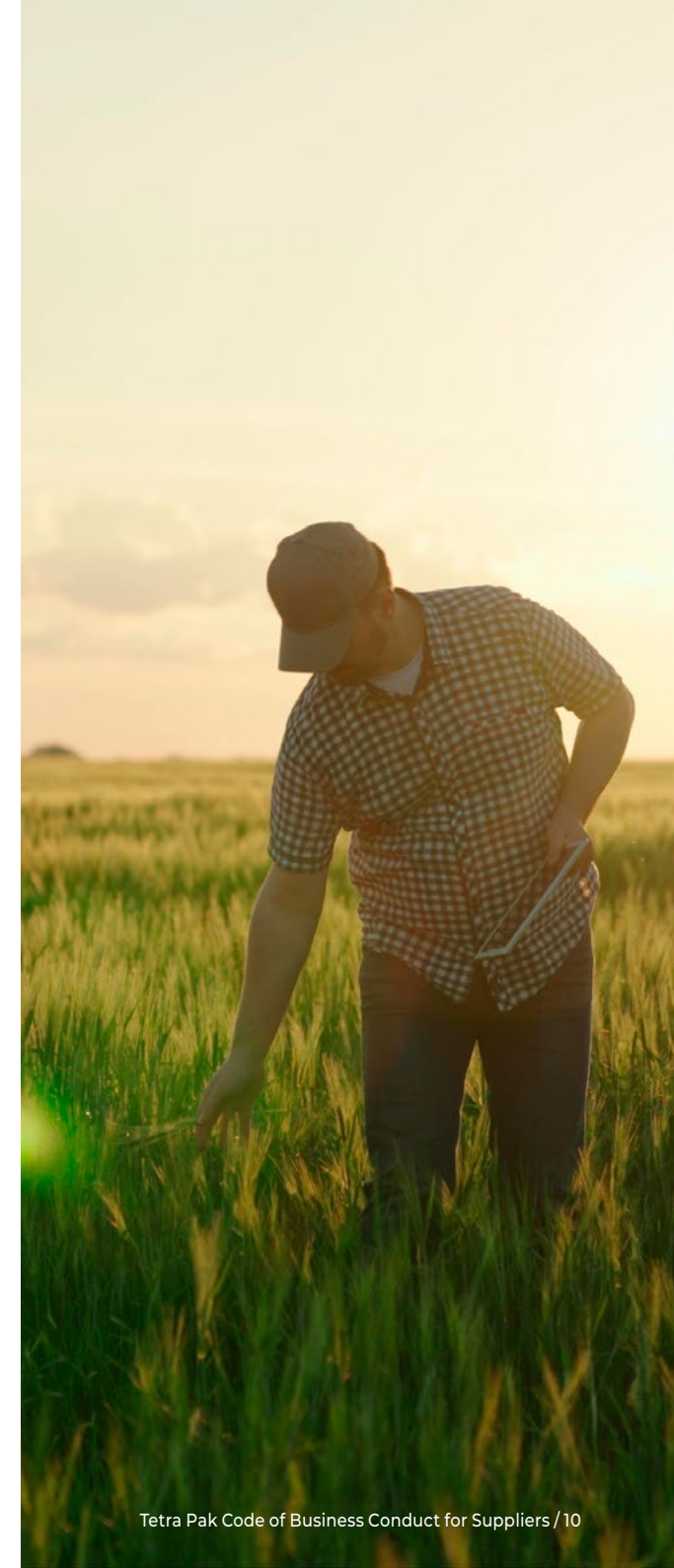
- 7.1** There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on protected characteristics. **M**

Anti-harassment

- 7.2** Workers are not subject to threats, penalties, coercion, physical force, violence, harsh or inhumane treatment, or bodily searches. **M**

Diversity, equality and inclusion

- 7.3** Specific measures are in place to increase diversity, equality and inclusion in the workplace. **GP**



People.

8. Grievance channels and remedy

Grievance channels

- 8.1** Workers have access to grievance channels to voice their concerns about potential misconduct. **M**
- 8.2** Workers can openly communicate and share concerns with you regarding working conditions and management practices without fear of discrimination, intimidation or retaliation. **M**
- 8.3** Grievance channels are aligned with the 'effectiveness criteria' for operational grievance mechanisms, as set out in the UN Guiding Principles on Business & Human Rights.¹¹ **GP**

Remedy

- 8.4** Where you have caused or contributed to a negative impact on human rights or the environment, you are expected to provide or cooperate in providing remedy for the affected stakeholders, in line with the UN Guiding Principles on Business & Human Rights.¹² **M**

9. Wages and working hours

Wages, benefits and insurance

- 9.1** Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. **M**
- 9.2** Workers receive the insurances and benefits, including leave entitlements, they are legally or contractually entitled to. **M**
- 9.3** Wages are paid, on time, regularly and in full. Workers receive a payslip or equivalent with complete pay, benefits and deduction information that reflects the pay received. Workers are provided with relevant information regarding the grounds for wage deductions. Wage deductions are not used as a disciplinary measure. **M**

- 9.4** Insurance covers workers in the case of any work-related injuries, accidents, illness, invalidity or death, in accordance with local worker compensation laws. **M**

- 9.5** A roadmap is in place to compensate workers in a way that meets or exceeds minimum local standards and in an amount that is sufficient to provide an adequate standard of living in the applicable community, in line with credible living wage benchmarks (e.g. Global Living Wage Coalition).¹³ **GP**

Working hours

- 9.6** The total hours worked in any 7-day period, including overtime, do not exceed 60 hours, unless in exceptional circumstances where all of the following are met: **M**
- this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Overtime

- 9.7** Overtime is performed in line with legal requirements and all overtime is on a voluntary basis. If the employment contract allows for contractual overtime, then workers expressly agree to it. Overtime is responsibly used and is paid at the appropriate premium rate according to legal requirements and/or collective bargaining agreements. **M**

Rest, breaks and leave

- 9.8** Workers receive at least 24 hours of consecutive rest in every 7-day period or, where allowed by national law, two 24-hour periods in every 14 days. **M**
- 9.9** Workers receive all legally required meal and rest breaks, as well as paid leave. **M**



People.

10. Occupational health and safety (OHS)

Risk assessment and mitigation

- 10.1** Occupational health and safety risks are assessed and actions are taken to mitigate them. These include appropriate controls, work procedures, workplace inspections, emergency plans, training and the provision of personal protective equipment (PPE).

First-aid and firefighting

- 10.2** First-aid and firefighting equipment are available and in working order. Workers trained in first aid and firefighting are available during operating hours in sufficient number to fit the occupational risks.

Emergency preparedness

- 10.3** Workers are prepared in case of emergency, including through the performance of emergency drills.

An independent evacuation alarm is audible and/or visible to all workers. It is possible to manually activate the alarm and alarm buttons are clearly visible and marked. Emergency evacuation routes and exits ensure quick and safe evacuation at all times.

Safety hazards

- 10.4** Safety hazards are continuously reported, analysed, followed-up and acted upon. All OHS-related incidents are investigated.

Building safety

- 10.5** Buildings are safe as per local laws and used for their intended purpose.

Working conditions

- 10.6** The working environment is clean, hygienic and well maintained and has adequate light, ventilation and, when necessary, heating or fans.
- 10.7** Toilets are safe, free of charge, hygienic, accessible during working hours, equipped with basic supplies and proportional to the number of workers. Clean drinking water is available free of charge and within a reasonable distance of the work area.

Housing

- 10.8** Where housing is provided for workers, it is in line with the guidance set out in ILO R115 – Workers' Housing Recommendation.¹⁴

11. Land rights

Land rights

- 11.1** Where relevant, the land rights and free, prior and informed consent of local communities and indigenous peoples are respected.

Human rights and environmental defenders

- 11.2** In some contexts, there are significant risks to environmental and human rights defenders, including trade unionists, indigenous peoples and community leaders. Threats, violence or intimidation towards human rights and environmental defenders is not permitted.



12. Children's rights

Child labour

- 12.1** Child labour is not permitted. This includes:
- Work under the age of 15 or the legal minimum age for work or minimum age for completing mandatory schooling as specified by local laws, whichever is higher.
 - Hazardous or night work performed by children.
 - Work that interferes with schooling.

We recognise that not all work performed by children is child labour and in certain situations where national law allows, the provision of decent work for 15–17-year-olds (young workers) can be beneficial.

Remediation

- 12.2** Where the risk of child labour is high, a remediation plan is in place in order to respond effectively and in the best interests of the child, should child labour be identified.

Planet.

13. Environmental management

Pollution

- 13.1** Actual and potential impacts related to air, water or soil pollution are assessed and where identified, measures are put in place to prevent, manage or minimise them.

Waste management

- 13.2** Waste is stored, handled, transported and disposed of in a way that protects the health and safety of people and the environment.

Chemical management

- 13.3** Chemicals and other materials posing a hazard to people or the environment are identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

Information on environmental performance

- 13.4** Environmental performance is monitored, with reference to targets and improvement plans. On request, data and information related to environmental performance is shared.

14. Climate and nature impacts

Climate

- 14.1** For suppliers that are defined by local or regional regulation as a small or medium-sized enterprise (SME), we encourage you to measure your greenhouse gas (GHG) emissions and consider mitigation actions.

For larger suppliers that exceed this threshold, a time-bound commitment and plan is in place to reduce GHG emissions, covering Scopes 1, 2 and 3 (where material). The commitment and plan are in accordance with a science-based approach that is aligned with the Paris Agreement.

Biodiversity and ecosystems

- 14.2** Actual and potential impacts related to biodiversity and ecosystems are assessed and where identified, measures are put in place to prevent, manage or minimise them.

- 14.3** For suppliers of agricultural and forest products and materials, such products do not originate from areas where there has been deforestation after 31 December 2020.

Water

- 14.4** Actual and potential impacts related to water are assessed and where identified, measures are put in place to prevent, manage or minimise them.

15. Resource circularity

Raw material management

- 15.1** For suppliers of raw materials to Tetra Pak, steps are taken to enhance the traceability of such materials.

- 15.2** Steps are taken to enhance the quality of the information on the renewable and recycled content of products and materials, as well as their recyclability.

Design for circularity

- 15.3** Products and materials are designed with circularity in mind.



Contacting us.

Informing us in case of an impact

We expect you to inform us of any actual severe impacts on people or the environment occurring in your operations or directly affecting the products or services sold to us. The severity of the impact is defined by you based on the scale, scope or irremediable character of the impact.

Raising a concern

In addition to the obligation above, anyone (including you, your workers, communities and/or other stakeholders) may raise a concern regarding actual or suspected breaches of our Code of Business Conduct for Suppliers to Tetra Pak by using our whistleblowing line (www.tetrapak.com/ethics).

Information can be submitted confidentially and anonymously (where permitted by law). We strongly support a culture of speaking up without fear of retaliation against those who raise a concern.

We will investigate the concern raised and, where necessary, request further information and align on remediation.

Links.

The following principles, standards and guidelines serve as a foundation for the Tetra Pak Code of Business Conduct for Suppliers and provide further context to the criteria set out in the Code.

¹ [Tetra Laval Group Code of Business Conduct](#)

² [UN Guiding Principles on Business & Human Rights](#)

³ [International Bill of Human Rights](#)

⁴ [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#)

⁵ [UN Declaration on the Rights of Indigenous Peoples](#)

⁶ [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)

⁷ [Ethical Trade Initiative Base Code](#)

⁸ [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

⁹ [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct / UN Guiding Principles on Business & Human Rights](#)

¹⁰ [ILO General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs](#)

¹¹ [UN Guiding Principles on Business & Human Rights: Effectiveness criteria for non-judicial grievance mechanisms](#)

¹² [UN Guiding Principles on Business & Human Rights](#)

¹³ [Global Living Wage Coalition](#)

¹⁴ [ILO Guidance on Workers' Housing](#)

