

12th May 2023

The Department of Corporate Services
BSE Limited
P J Towers,
Dalal Street,
MUMBAI – 400 001
Fax No.: (022) 2272 3121/3719/2037
corp.relations@bseindia.com

Security Code No.: 509820

Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, Plot no. C/1,
G Block, Bandra-Kurla Complex, Bandra (East)
Mumbai - 400 051
Fax. No. (022) 26598237/8
cmlist@nseindia.com

Security Code: HUHTAMAKI

Sub: Business Responsibility and Sustainability Reporting (BRSR) for the financial year ended 31st December 2022.

Ref: Huhtamaki India Limited

Dear Sir,

Please find enclosed herewith Business Responsibility and Sustainability Reporting (BRSR) of the Company for the financial year ended 31st December 2022.

You are requested to take the above information on your records.

For Huhtamaki India Limited


D V Iyer
Company Secretary & Legal Counsel
Encl: As above



BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (BRSR)

Section A: General Disclosures

This is the first edition of our BRSR report for fiscal year 2022, in which we have endeavoured to disclose all non-financial disclosures required by SEBI. The report offers all of our stakeholders a comprehensive perspective and insight into our company's impact on the economy, the environment, and society, which can be used to showcase our organization's commitment to sustainable development. To suit the needs of our investors and other stakeholders, our report continues to move towards increased transparency as well as our strategic approaches to create value for our stakeholders while managing risks in the external environment.

1. Details of the listed entity

Corporate Identity Number (CIN) of the Listed Entity	L21011MH1950FLC145537
Name of the Listed Entity	Huhtamaki India Limited
Year of incorporation	June 12, 1950
Registered office address#	12A-06, B wing Parinee Crescenzo, Plot Nos. C38/C-39, G" Block, Behind MCA, BKC, Bandra (E), Mumbai - 400051, Maharashtra, India
Corporate address	LBS Marg Majiwada Thane (West) - India
E-mail	investor.communication@huhtamaki.com
Telephone	+91 (022) 61740400
Website	www.flexibles.huhtamaki.in
Financial year for which reporting is being done	January 1, 2022, to December 31, 2022
Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited (NSE), BSE Limited (BSE)
Paid-up Capital	₹151.1 Mn
Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr Dakshinamurthy Iyer +91 (022) 61740400 Email Id: Dv.Iyer@huhtamaki.com Company Secretary & Legal Counsel
Reporting boundary	Disclosures made in this report are on a standalone basis and pertain to Huhtamaki India Limited

#The registered office address of the Company has changed to A - 802, Crescenzo, C-38/39, G" Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400051 with effect from April 01, 2023..

2. Products/services

Details of business activities (accounting for 90% of the turnover):

S. no.	Description of main activity	Description of business activity	% Of turnover of the entity (FY2022)
1	Manufacturing and sale of flexible packaging material	We are committed to helping businesses enhance their first impressions by offering trustworthy, ethical, and innovative packaging solutions. Over the course of eight decades, we have built up a strong position as a pioneer in flexible packaging and decorative labelling solutions in India by utilizing all available modern technology. Whether a customer wants recyclable high barrier applications, clever apertures, or a unique finish, we offer creative solutions for each one. We offer a range of package designs and formats. Under the blue loop brand, we also provide other mono-material packaging solutions, such as paper, Poly Ethane (PE), and Poly Propylene (PP).	98.36%

3. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% Of total turnover contributed
1	Flexible Packaging Material and allied Products	32009	98.36%

4. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	Total 15 <ul style="list-style-type: none"> • Talaja, Mahape, Khopoli, Ambernath (4 plants in Maharashtra) • Sri City (Andhra Pradesh) • Silvassa (Dadra and Nagar Haveli) • Daman • Guwahati (Assam) • Gangtok (Sikkim) • Rudrapur (Uttarakhand) • Baddi (Himachal Pradesh) • Hyderabad (Two plants in Telangana) • Bengaluru (Two plants in Karnataka) 	<ul style="list-style-type: none"> • Offices in Bandra-Kurla Complex (Mumbai), Thane and Airoli • 1 R&D center in Khopoli (Maharashtra) • Delhi Office • Kolkata Office 	21
International	Zero	1 office in United Kingdom	1

5. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States and Union Territories)	28 Indian states along with 8 Union territories
International (No. of Countries)	We service over 70 countries outside India across Europe, Africa, Oceania, Southeast Asia, and Australia, North America and South America. We are one of the only few packaging manufacturers in India that supply to Central and South America.

b. What is the contribution of exports as a percentage of the total turnover of the entity?

27.65% is the contribution of exports to the total turnover of our entity

c. A brief on types of customers:

We manufacture state-of-the-art packaging for different kinds of products while maintaining high quality standards. We offer light, innovative and increasingly sustainable flexible packaging materials, pouches and labels for food and beverages, coffee packaging, pet food packaging, barrier packaging, retort pouches and packaging for healthcare products. We serve all B2B customers, the majority of which are in the FMCG and pharmaceutical sectors, with the exception of tobacco companies due to internal company policies.

6. Employees

Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1223	1066	87.16%	157	12.84%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total employees (D + E)	1223	1066	87.16%	157	12.84%
WORKERS						
4.	Permanent (F)	1683	1671	99.29%	12	0.71%
5.	Other than Permanent (G)	555	555	100%	0	0%
6.	Total workers (F + G)	2238	2226	99.46%	12	0.54%

b. Differently abled Employees and workers

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES/WORKERS						
1.	Permanent (D)	Huhtamaki is an equal opportunity employer and we do not believe in discrimination on the basis of race, colour, religion, sexual preferences, physical or mental disability, age or otherwise. At Huhtamaki, we are dedicated to providing a safe, engaging and high-performance culture which represents the diversity of the country and we invest in fostering an environment where everyone enjoys physical and psychological safety and where diversity and inclusion are promoted through day-to-day behaviours and embedded into all our policies and practices. We aim to attract and develop a workforce that nurtures an inclusive workplace where everyone, despite their differences are respected and valued, where people are treated equitably and where everyone feels a sense of belonging. We are also working towards creating inclusive new workplaces in the future to satisfy the specific demands and preferences of differently abled employees.				
2.	Other than Permanent (E)					
3.	Total differently abled employees (D + E)					
4.	Permanent (F)					
5.	Other than permanent (G)					
6.	Total differently abled workers (F + G)					

7. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.5%
Key Management Personnel	3	0	0

8. Turnover rate for permanent employees and workers

	FY2022			FY 2021			FY 2020		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	11.76%	13.97%	12.04%	18.17%	29.03%	19.65%	8.14%	9.08%	8.27%
Permanent Workers	8.66%	8.35%	8.66%	12.86%	31.00%	12.98%	8.69%	45.71%	9.24%

9. Holding, Subsidiary and Associate Companies (including joint ventures)

(a) Names of holding / subsidiary / associate companies / joint ventures

Holding Company – Huhtavefa B V

We do not have any holding / subsidiary / associate companies / joint ventures

10. CSR Details

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) -Yes

(ii) Turnover (in Rs.) - 29,165 Million INR

(iii) Net worth (in Rs.) – 7569.6 Million INR

11. Transparency and Disclosures Compliances

Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY2022		FY 2021	
		Current Financial Year	Previous Financial Year	Current Financial Year	Previous Financial Year
		Number of complaints/ queries* filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
Communities	Policies need to be uploaded on Website	0	0	0	0
Investors (Other than shareholders)		12*	0	0	0
Shareholders		3	0	1	0
Employees and Workers		2	0	0	0
Customers		755	0	1099	0
Value Chain Partners		0	0	0	0
Others (Please specify)		0	0	0	0

TSR Consultants Private Limited (TCPL) is a SEBI registered Category 1 Registrar with over 50 years of expertise in managing Investor Services has been appointed as the Company's Registrar and Share Transfer Agent (RTA). TCPL has a customized question and complaint handling structure in place to ensure accountability and a timely response to each query/complaint. Correspondence received in the form of Legal Notices and through Regulatory Bodies is handled by professionals who are conversant with the different procedures and activities. Complaints received through the SCORES portal or through the Stock Exchange are addressed, and Action Taken Reports for such complaints are filed on the specified site or provided to the Companies for submission to the applicable Regulatory Bodies. Queries from investors / shareholders on performance and other aspects related to Huhtamaki are recorded and traced as per the Standard Operating Procedure on Investor Complaints, approved by the Stakeholder Relationship Committee at their meeting held on 28 March 2022 and 11 November 2022. . We also track, monitor and address complaints received from customers as and when received.

12. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

Globally, we regularly update our materiality assessment to ensure that our sustainability aspirations include the most important concerns for us and our stakeholders. We continue to address the material issues in cross-functional teams, constantly seeking ways to enhance our policies and procedures in order to attain world-class performance in these areas. To ensure that our sustainability work focuses on the most important issues, we constantly monitor the most recent developments and trends in the sustainability area, changes in regulations, and feedback from stakeholders. We also update our materiality assessment on a regular basis.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Product safety	Risk	Since our primary customers are from the pharmaceutical and FMCG sectors, packaging material plays a critical role in maintaining the composition of medicines and food quality, shelf life, safety during shipment and any critical shortcoming in product safety or quality could negatively impact the company's reputation, resulting in an impact on sales.	We employ stringent quality control methods in all of our production activities, as well as formal testing processes for new products and materials. Quality and hygiene management systems, such as ISO 9001 and BRCGS, providing a strong foundation for ensuring consistency in product safety	We primarily offer our packaging solutions to B2B clients, where any decline in sales owing to a loss of reputation can result in significant revenue losses as the business coming from them is mostly bulk and recurring purchases. Also, the company will have to incur additional expenses to replace and resolve client complaints
2	Materials management	Risk and Opportunity	Material management is an important aspect of the packaging industry since it can lead to a high chance of product damage during shipping and distribution, resulting in significant financial and reputation loss. Furthermore, if the proper packing material is not used, it might result in the accumulation of hazardous waste in the environment.	As part of our innovation process, we are focused on sustainable packaging solutions to meet socioeconomic demands.	The right packaging solution not only extends the shelf life of the product and keeps the products safe for consumption but also helps to develop brand image for the company and reduce environmental impact for the society
3	Energy	Risk and Opportunity	Improving energy efficiency throughout our activities is a key component of our Energy Strategy. This is extremely critical given our high growth goals; we must always develop methods to produce more effectively in order to offset the emissions caused by increased output. Increasing the percentage of renewable power is another important tool for combatting our emissions.	The company's environmental strategy and activities toward energy efficiency are driving the tremendous improvement in energy reduction. The policy's objective is to ensure that everyone in the organization understands our environmental obligations, designing and implementing a global energy plan to enhance energy efficiency, transition to low-carbon fuels, and raise the global proportion of renewable power	Shifting more towards renewable energy in manufacturing of packaging solutions can lower maintenance cost and requirements. It also helps in cleaner and greener environment thus contributing to sustainable ecosystem
4	Climate and emissions	Risk	Extreme environmental changes can harm any organization by disrupting the procurement of raw materials, the production process, and the supply chain. Government regulations and norms on climate and emissions can also have a huge impact on business.	We have started identifying and evaluating climate change risks to the company as part of our due diligence procedures and take necessary mitigating and adapting action. Our global climate goals are ratified by the Science based targets initiative. This will also aid in the transition to a carbon-neutral society. Our goal is to reach carbon-neutral production by 2030.	Climate change can have both direct and indirect impact on our company. Direct impact may include physical damage, loss of essential resources and indirect impact may include supply chain disruption, rising costs in different phases of production and other adverse impacts.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Transition to a circular economy	Both as Risk and Opportunity	Currently in India, Most flexible packaging is intended for single-use and is discarded rather than reused or recycled. Packaging consumes a lot of resources, including energy, water, chemicals, petroleum, minerals, wood, and textiles. Its production frequently produces air pollutants such as greenhouse gases, heavy metals, and particulates, as well as hazardous wastewater and/or sludge.	<p>We are ensuring our products are recyclable, compostable, or reusable and minimizing our environmental footprint across the value chain by focusing on designing for circularity and promoting sustainable end-of-use for packaging.</p> <p>Our Blue loop program was initiated with this objective of ensuring that all our packaging solutions are recyclable, reusable or compostable by 2030. Our innovation and research efforts are strongly focused on delivering packaging solutions that adhere to this design philosophy.</p> <p>We are also compliant on the plastic waste management rules in India and are ensuring that we meet our Extended Producers' Responsibility (EPR) targets</p>	Packaging waste accounts for a large portion of landfill waste, which contributes to climate change and air pollution and can endanger ecosystems and species adversely. There is no quantifiable financial implication, however, it does have an impact on our overall business operation.
6	Waste and recycling				
7	Water	Risk	We value water as a precious natural resource that is essential for food, people, and the environment and in Huhtamaki, water is essential as it is utilized in manufacturing activities. Recognizing the human right to water and sanitation, we concentrate on controlling and reducing our effect on water resources.	<p>In our water management strategies, we emphasize controlling and reducing our impacts on water resources. We safeguard water ecosystems especially in water stress areas.</p> <p>The plans include alignment with the Huhtamaki strategy, site-specific water risk assessments, targets connected with performance indicators, and control and monitoring metrics that permit follow-up and detection of issues.</p> <p>The global sustainability unit is driving this strategic endeavor by assisting local stakeholders in undertaking water resource analysis and management.</p> <p>We have initiated our focus to achieve zero liquid discharge status for our factories. Four of our sites have already achieved ZLD status.</p>	Water scarcity can disrupt manufacturing activities and water storage and transfer infrastructure can incur substantial amounts of costs to the company.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8	Human rights	Opportunity	Businesses that respect human rights exhibit their dedication to developing long-term, mutually beneficial relationships with people who affect or are influenced by their activities, such as consumers, communities, workers, and investors.	We reviewed our existing policies and processes, as well as conducted a worldwide evaluation of our possible human rights risks and implications.	<p>Huhtamaki India conforms to the Program on Responsible Sourcing under the AIM-PROGRESS consortium. Under this program, the process of verification / audit of compliance is called SEDEX (SUPPLIERS ETHICAL DATA EXCHANGE) and the Model Responsible Sourcing Audit is call SMETA (SEDEX Members Ethical Trade Audit).</p> <p>The scope of SMETA audit are (a) Business Integrity (b) Health & Safety (c) Labor (d) Environment. There is a prescribed audit checklist for the audit, where in the auditors will look for compliance to applicable local law and /or the customer specific requirement, whichever is stricter. This certification can be done using the services of approved certifying agencies. There are few customers who have their own model, which is similar to SMETA. For those customers, applicable conversion of report is done by the certification body engaged.</p> <p>SMETA audit doesn't lead to any certification and Individual customers are expected to review the audit report of the site and provide a compliance validity. Minimum Compliance is for 1 year, and maximum can be 3 years. As a good practice, Huhtamaki India ensures that all its packaging and label manufacturing sites undergo SMETA audit at least once a year. Except Ambernath unit, which got commissioned very recently , all plants have gone through the requisite audit in last one year and put in due diligence for closure of the findings.</p> <p>At a global level, as a pilot project, Huhtamaki has conducted its first human rights impact assessment at one of our sites. The findings of both the global review and the local level evaluation will help us increase our human rights due diligence and expand other aspects of social sustainability throughout the organization.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Diversity and equal opportunity	Opportunity	We seek to foster an inclusive and diverse workplace, and to achieve that we aim to attract, develop, and retain the finest talent in a conducive work environment, by imparting appropriate training programs, by modifying policies and by embracing the differences.	We celebrate diversity and promote equality by being inclusive of all.	We believe that diverse teams, in terms of gender, ethnicity, and characteristics, bring fresh views, greater creativity and innovation to the table. Diversity in teams increases performance, efficient decision making, and effective collaboration.
10	Employee attraction and retention	Opportunity	When it comes to talent, hiring the right people and putting in place the necessary measures to allow them to flourish are critical to building a productive, high-performing culture. By adhering to our principles of Care, Dare, and Deliver, we all become the driving force behind putting our plan into action.	We strive to provide employment experience in which employees feel protected, appreciated, and included, as well as an atmosphere in which they can make their distinctive contribution.	Developing our diverse talent is a key component of our 2030 Strategy and it is the key to our future success. Talent development is the process through which we improve our workers' talents and capacities so that they may thrive in their positions.
11	Employee training	Opportunity	At Huhtamaki, we believe that learning is the foundation of superior performance and employees should carve their own path by determining where they want to go in their careers. We help them by offering organized learning, on-the-job training, opportunities to learn from others and various training and development programs.	We provide continuous skill development and learning opportunities through organized training programs, career conversations, and individual development programs for high performance and career progression.	Training and development help in attracting and retaining top personnel, increasing employee satisfaction and morale, increasing productivity, and increasing profits.
12	Labor retention	Opportunity	We believe that labor relations are essential in manufacturing focused business. We have followed principles set out by International Labor Organization	Good Labor relations translate in overall productivity and leads to higher work satisfaction levels.	Our various Projects focuses on improving efficiency of manufacturing network, labor productivity and reduce wastages from operations to boost the long-term competitiveness of the Company
13	Occupational health and safety	Risk	It is vital to provide a safe working environment in order to minimize absenteeism and boost employee morale. Risks related to incidents that potentially compromise health and safety can impose various threats to human lives associated with the company.	Huhtamaki places a high priority on occupational health and safety (OHS). We are developing a safe work culture to integrate safety across the company. Huhtamaki's objective is to create a mindset along with training targeted towards the aim that no one is affected, and everyone returns home safely at the end of the day. Machine safety has always been a top priority for Huhtamak	Working days are lost owing to work-related illness and injury, which impedes our product production and supply.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
14	Supply chain and responsible sourcing	Risk	The supply chain is extremely important in the packaging sector, and any interruption in this may expose the company to different types of risks. Since the majority of our clients manufacture and use our packaging material for their products and commodities that are fast moving and essential, the stock must be replenished and supplied to retailers within the stipulated time to meet the growing demands of customers.	Huhtamaki's enhanced supply chain due diligence methodology is designed to detect supply chain risks and covers all ethical, social, and environmental standards. All-important suppliers, accounting for the top 80% of procurement expenditure, are now systematically screened in the Group's supplier monitoring tool against sanctions lists, watch lists, and unfavorable media, assisting Huhtamaki in identifying and addressing issues in the supply chain.	Supply chain interruptions caused by the pandemic and other unprecedented challenges can result in unusual input cost inflation in raw resources, freight, energy, and labor.
15	Customer satisfaction	Opportunity	We customize our packaging solutions to the client's product specifications and requirements, and we feel that this allows us to better understand their demands and offer our products to them, lowering the primary expense of major modifications or wasteful manufacturing.	We commit to and offer solutions to our customers with honesty and as a team, and are ambitious for going above and beyond in terms of performance for customer satisfaction	Customer satisfaction leads to increased customer retention, higher lifetime value, and a more positive brand reputation.
16	Anticorruption and ethics	Opportunity	The Huhtamaki Ethics and Compliance program focuses on Huhtamaki's commitment to ethics and legal compliance. The program is a toolbox that assists Huhtamaki in operating its business in accordance with laws, rules, and ethical principles, as well as ensuring that the company has proper processes in place to prevent Huhtamaki from engaging in unethical business practices.	At Huhtamaki, we believe that strong ethics make excellent business sense, and our business operations reflect this commitment to upholding the highest ethical standards.	The significant advantage of an ethical code is that it will build an environment of trust, ethical behavior, integrity, and excellence amongst the company, its employees and all the stakeholders

Section B: Management and Process disclosures

Huhtamaki's goal in this section is to highlight how the NGRBC Principle and its Core Elements have been adopted through the structures, policies, and procedures that have been put in place.

S. No.	Principle Description
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive to all its stakeholders
P5	Businesses should respect and promote human rights
P6	Businesses should respect and make efforts to protect and restore the environment
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9																																																																																										
Policy and management processes																																																																																																			
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) [UNSDG: 16.6]	Y	Y	Y	Y	Y	Y	N	Y	Partially																																																																																										
b. Has the policy been approved by the Board? (Yes/No) [UNSDG: 16.6]	The Board has approved and signed all mandatory policies required by Indian laws and regulations. Other operational internal policies are authorized and signed by management and the Managing Director/Director.																																																																																																		
c. Web Link of the Policies, if available** [UNSDG: 16.6]	The web link for the policies is https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/																																																																																																		
2. Whether the entity has translated the policy into procedures. (Yes / No) [UNSDG: 5.5, 16.7]	Y	Y	Y	Y	Y	Y	N	Y	Partially																																																																																										
3. Do the enlisted policies extend to your value chain partners? (Yes/No) [UNSDG: 12.2, 12.4, 12.5, 12.8]	We are dedicated to ensuring that our supply chain abides by the Huhtamaki Code of Conduct for Suppliers and that we engage with responsible suppliers in all of our global operations. It serves as the cornerstone for our supply chain due diligence and the compliances and ethical conduct we expect from our suppliers on social and environmental parameters. The NAVEX Risk Rate tool tracks the number of significant suppliers who have acknowledged the Code. Huhtamaki's suppliers are also responsible for the compliance of their subcontractors. If their own Code of Conduct meets the standards of Huhtamaki, we may accept it as a substitute.																																																																																																		
4. Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) mapped to each principle.	<table border="1"> <tr> <td>Principle 1</td> <td colspan="9">We have the below mentioned national and international codes/certifications/labels/standards</td> </tr> <tr> <td>Principle 2</td> <td colspan="9">Principle 3 : OHSAS 18001, ISO 45001</td> </tr> <tr> <td>Principle 3</td> <td colspan="9">Principle 6 : Forest Stewardship Council, Program for the endorsement of forest certification, Sustainable Forestry Initiative, ISO 14001, Eco Management and Audit Scheme or the Internal Environmental Care program, ISO 50001</td> </tr> <tr> <td>Principle 4</td> <td colspan="9"></td> </tr> <tr> <td>Principle 5</td> <td colspan="9">Principle 9 : ISO/ IEC 17021: 2015, ISO 9001</td> </tr> <tr> <td>Principle 6</td> <td colspan="9">We have not mapped our operations to any other codes/certifications/labels/standards than the ones mentioned above.</td> </tr> <tr> <td>Principle 7</td> <td colspan="9"></td> </tr> <tr> <td>Principle 8</td> <td colspan="9"></td> </tr> <tr> <td>Principle 9</td> <td colspan="9"></td> </tr> </table>									Principle 1	We have the below mentioned national and international codes/certifications/labels/standards									Principle 2	Principle 3 : OHSAS 18001, ISO 45001									Principle 3	Principle 6 : Forest Stewardship Council, Program for the endorsement of forest certification, Sustainable Forestry Initiative, ISO 14001, Eco Management and Audit Scheme or the Internal Environmental Care program, ISO 50001									Principle 4										Principle 5	Principle 9 : ISO/ IEC 17021: 2015, ISO 9001									Principle 6	We have not mapped our operations to any other codes/certifications/labels/standards than the ones mentioned above.									Principle 7										Principle 8										Principle 9									
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5. Specific commitments, goals and targets set by the entity with defined timelines, if any. [UNSDG: 5.5, 12.2, 12.4, 12.5]	Huhtamaki India has identified targets with respect to water, waste, product recyclability, material use in terms of product, carbon neutrality, diversity, and inclusion etc.																																																																																																		
6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	We intend to reach carbon neutral production by 2030, our absolute Scope 1+Scope 2 emissions in 2022 were 68171 tons which was a 2% reduction vs. 2021. We are recycling 98.7% of our non-hazardous waste against our target of 90%. 13% of our material usage is from renewable or recycled sources. Our Health & safety Lost time frequency rate for 2022 was 0.98																																																																																																		

Governance, leadership, and oversight

7. A statement from Mr Dhananjay Salunkhe, Managing Director (DIN: 09683886)

A detailed summary of our Managing Director's statement on sustainability goals, commitments and our contribution till now is available in our Annual Report for FY 2022. Read more in the message from the MD on page 18.

[UNSDG: 5.5, 16.7]

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies

Managing Director of Huhtamaki India Limited

[UNSDG: 12.2]

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

The Corporate Social Responsibility Committee of the Board is currently responsible for decision making on ESG related matters. Recommendations from the CSR Committee are considered by the Board of Directors of Huhtamaki.

[UNSDG: 12.2]

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee																		Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	1	2	3	4	5	6	7	8
Performance against above policies and follow up action	Yes, we continuously track and update our policies as per the national guidelines and in alignment to the global group policies																										
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	All of our policies are as per the requirements under NGRBC guidelines. We are compliant with legal requirements.																										

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.

P 1 P 2 P 3 P 4 P 5 P 6 P 7 P 8 P 9

The accreditation process includes ongoing periodic assessments as well as internal and external audits of the Quality, Safety & Health, and Environmental Policies. Through an internal audit procedure, the effectiveness of other policies is routinely assessed. The various Committees and the Board regularly examine all Company Policies.

12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:

Questions	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	
The entity does not consider the principles material to its business (Yes/No)	The questions mentioned here are not applicable to Principle 1, Principle 2, Principle 3, Principle 4, Principle 5, Principle 6, Principle 8 as Huhtamaki's policy considers and covers them.									
The entity is not at a stage where it or in a position to formulate and implement the policies on specified principles (Yes/No)	We are dedicated to developing policies in the next years around Principle 7 since we understand that we must contribute to making crucial decisions in the best interests of the public by addressing their concerns.									
The entity does not have the financial or/ human and technical resources available for the task (Yes/No)	We do not have a standalone policy addressing Principle 9, but we do have a structure in place to ensure that customer complaints are received and resolved promptly. We have developed our website to disseminate pertinent information about our products and services to customers and other stakeholders.									
It is planned to be done in the next financial year (Yes/No)										
Any other reason (please specify)										

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.



Our ethical and transparency framework reflects how we treat our stakeholders including employees, customers, communities, and the environment. It builds trust and provides employees with a sense of pride that they work for a company that is committed to the highest ethical standards. We have created Global Huhtamaki Working Conditions Requirements on ethics, employment, and occupational health and safety procedures, to which all employees must conform. The Huhtamaki Ethics and Compliance programs focuses on Huhtamaki's commitment to ethics and legal compliance. The program is a toolbox that assists Huhtamaki in operating its business in accordance with laws, rules, and ethical principles, as well as ensuring that it has proper processes in place to prevent Huhtamaki from engaging in unethical business practices.

Essential Indicators

1. Percentage coverage by training and awareness programs on any of the principles during the fiscal year:

[UN SDG: 16.3,16.7]

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	%Age of persons in respective category covered by the awareness programs
Board of Directors Key Managerial Personnel	As part of the Familiarization Program for Independent Directors, the Independent Directors visited Huhtamaki Oyj, headquartered in Espoo, Finland. Details of the program are set out in the Corporate Governance Report at page 68.		100%
Employees other than BoD and KMPs	1070	The training modules have been designed with the core values of Care, Dare, and Deliver at the forefront.	
Workers	687	The topics covered were around Human Rights, Digital Skills, Code of Conduct, Leadership Development, Employee Wellness and Occupational Health & Safety	

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/ Enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	There were no fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year				
Settlement					
Compounding fee					
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	There were no fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year				
Punishment					

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Since there were no fines / penalties / punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year no appeals/ revisions were filed.	

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

[UN SDG: 16.5]

Yes, our Company's code of conduct includes an anti-corruption and anti-bribery policy, which has been disseminated to our employees and workers through e-learning modules and face-to-face training sessions to raise their awareness and assist them in evaluating scenarios and making responsible decisions.

The Huhtamaki Code of Conduct is the core element of Huhtamaki's Global Ethics and Compliance program. The Code works as a compass, helping Huhtamaki to navigate and use consistent legal and ethical judgment in its daily work. Anti-bribery and corruption provisions are an integral part of the Code. The Ethics and Compliance function oversees the implementation of the company's Ethics and Compliance program by advising and supporting conduct of business with high integrity and in compliance with laws and regulations, including anti-bribery and corruption provisions. In addition, these provisions are included in the Code of Conduct for Huhtamaki Suppliers.

Huhtamaki strongly believes that conducting business with integrity is the right thing to do and is also its license to operate. The structured ethics and compliance program also helps Huhtamaki to answer to the growing interest of external stakeholders on ethics and compliance matters, and to the needs of Huhtamaki's global organization by establishing a standard, structured approach to handle ethics and compliance matters across all Huhtamaki units globally.

Please click here to access the policies:

<https://www.huhtamaki.com/en/sustainability/reports-and-policies/>

<https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/>

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption.

[UN SDG: 16.5]

	FY2022	FY 2021
Directors	We have zero cases where any law enforcement agency has taken disciplinary action against Directors/KMPs/employees/workers on charges of bribery/corruption. Our senior leadership upholds the highest level of honesty and integrity and instills the same in other levels of management because anti-corruption and anti-bribery are critical for not only protecting the company's reputation but also the wider interests of all shareholders and has a positive impact on sustainable development.	
KMPs		
Employees		
Workers		

6. Details of complaints with regard to conflict of interest:

[UN SDG: 16.6]

	FY2022		FY 2021	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors		We have recorded zero complaints with respect to conflict of interest of directors or KMPs. Employees at Huhtamaki are required to avoid conflicts of interest, which may develop when an employee has a personal interest or is involved in an activity that may interfere with such individual's ability to perform tasks objectively, impartially, and effectively. To avoid any form of conflict of interest, we promote the finest standards of ethics and compliance and are diligent in detecting and mitigating any such instances promptly.		
Number of complaints received in relation to issues of Conflict of Interest of the KMPs				

Please click [here](#) to view Corporate Governance Policy of Huhtamaki

7. Provide details of any corrective action taken or underway on issues related to fines / penalties /action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

[UN SDG: 16.5]

None.

Leadership Indicators

1. Awareness programs conducted for value chain partners on any of the principles during the financial year:

[UN SDG: 16.7]

The Code of Conduct for Huhtamaki Suppliers is the foundation for our supply chain due diligence and sets out what we expect our suppliers to comply with. It covers topics related to business ethics, as well as social and environmental responsibility. The number of key suppliers who have acknowledged the Code is monitored through the NAVEX RiskRate tool. For other suppliers, monitoring is done at the unit level. Huhtamaki's suppliers are also responsible for their subcontractors' compliance with the requirements. We also provide suppliers with the opportunity to share their own Code of Conduct with us. If their own Code of Conduct fulfills the requirements of Huhtamaki, it is possible for us to accept it as a substitute. Our suppliers and workers in the value chain can report any violations of the Code of Conduct for Huhtamaki Suppliers or other Huhtamaki policies via Huhtamaki's global whistleblowing system, the Huhtamaki Speak Up channel.

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.

All Directors are obligated to disclose to the Board their nature/conflict of interest during their onboarding and any subsequent modifications have to be intimated timely. Transactions or any matters concerned with the board members must be authorized by the audit committee. In such instances, the interested directors abstain themselves from the meeting. We also have a Policy on 'Related Party Transactions' and a 'Code of Conduct' in place, both of which apply to our board members.

Weblink : <https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/>

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe



Huhtamaki as an organization is making significant investments in innovation and research because we believe it will allow us to develop cutting-edge products that will not only be sustainable but will also provide value to our customers and satisfy the demands of their end consumers. We are willing to support the local vendors, vulnerable groups, and other supply chain partners who can assist us in meeting our strategic goals and long-term sustainable aspirations as supporting them since doing so would imply contributing to the economy's overall success.

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY2022	FY 2021	Details of improvements in environmental and social impacts
R&D	(Total) 12.1 Million INR/Specific techs amount required	(Total)14.6 Million INR/ Specific techs required	The investments help in the development and manufacturing of sustainable packaging solutions in line with our 2030 ambition.
Capex	(Total) 19.6 Million// Specific techs amount required	-	

2. Does the entity have procedures in place for sustainable sourcing? (Yes/No) b. If yes, what percentage of inputs were sourced sustainably?

[UNSDG: 5.2, 8.8,16.1]

Our supplier network consists of global key suppliers and a large network of local partners close to our manufacturing units. Responsible sourcing is based on close cooperation, and it includes developing and utilizing new supplier screening tools and processes as well as aligning with third-party verifications and standards. As a responsible company we want to ensure that our suppliers meet the environmental, social and governance expectations we set out in our Code of Conduct for Huhtamaki Suppliers

The Code of Conduct for Huhtamaki Suppliers is the foundation for our supply chain due diligence and sets out what we expect our suppliers to comply with. It covers topics related to business ethics, as well as social and environmental responsibility.

The NAVEX Risk Rate tool, which screens all important suppliers against sanction lists, watchlists, Politically Exposed Persons lists, and negative media, is a critical component in responsible procurement. The screening process will continue as long as the supplier remains an active strategic supplier for Huhtamaki. If there are any matches in the above-mentioned lists, Risk Rate will immediately notify us with more case information. During the onboarding process, suppliers are also handed a questionnaire based on their initial risk assessment. All suppliers are required to declare conformity with the Huhtamaki Suppliers Code of Conduct. Medium-risk suppliers are given questions to determine the likelihood of corruption and legal compliance. Potential high-risk suppliers are asked additional questions on sanctions, ethics, and compliance.

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

[UNSDG: 3.9, 6.3, 6.6, 8.4, 11.6, 12.4]

Since our product forms an integral part of our customer's product, we are not able to reclaim or recycle the products. However as per the Extended Producers responsibility targets, we collect and recycle post-consumer use plastics or ensure end of life treatment as may be applicable.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes, Extended Producer Responsibility is applicable to our activities, and we are compliant with the Plastic Waste Management Rules Requirements regarding the same.

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

[UNSDG: 12.4]

Huhtamaki India Ltd. does not currently perform Life Cycle Assessments (LCA) for any of its goods or services, but we hope to establish LCA capabilities in India in the upcoming years. Our global headquarters has started the LCA process, and over the next few years, we hope to learn and replicate it to our operations as Huhtamaki India Limited.

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

[UNSDG: 3.9, 6.3 8.4, 11.6, 12.4]

This question is not applicable as per the above-mentioned statement.

3. Percentage of recycled or reused input material to total material (by value) used in production (For manufacturing industry) or providing services (for service industry).

[UNSDG: 8.4, 12.2, 12.5]

Huhtamaki is currently not using any recycled or reused input material in production or providing services.

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed of.

[UNSDG: 8.4, 12.2, 12.5]

	FY2022			FY 2021		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (Including packaging)	Huhtamaki India is currently not using any reclaimed material in their products.					
E-waste						
Hazardous waste						
Other waste						

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

[UNSDG: 8.4, 12.2, 12.5]

As per the regulations, we are currently recycling 100% of our EPR targets by recycling and end of life treatments as applicable.

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains



Employee satisfaction is paramount to us because it leads to increased levels of engagement, productivity, morale, and lower turnover. Employees are an organization's most valuable asset since they not only serve as a link with the customers but also greatly contribute to the organization's success. Employees feedback is acknowledged in our organization, and their perspective is essential to us. To maintain their satisfaction, we give industry-leading benefits to our entire workforce. Our Speak Up channel and other redressal mechanisms enable workers to report issues from wherever in the organization, allowing them to be addressed rapidly and effectively.

Essential Indicators

1. a. Details of measures for the well-being of employees.

[UN SDG: 3.2,5.4,8.5,8.6]

Category	% Of employees covered by										
	Total	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	(A)	Number	%	Number	%	Number	%	Number	%	Number	%
		(B)	(B / A)	(C)	(C / A)	(D)	(D / A)	(E)	(E / A)	(F)	(F / A)
Permanent employees											
Male	1066	1066	100%	1066	100%	0	0%	1066	100%	0	0%
Female	157	157	100%	157	100%	157	100%	0	0%	0	0%
Total	1223	1223	100%	1223	100%	157	100%	1066	100%	0	0%

b. Details of measures for the well-being of workers:

Category	% Of workers covered by										
	Total	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	(A)	Number	%	Number	%	Number	%	Number	%	Number	%
		(B)	(B / A)	(C)	(C / A)	(D)	(D / A)	(E)	(E / A)	(F)	(F / A)
Permanent workers											
Male	1671	1671	100%	1671	100%	0	0	1671	100%	0	0
Female	12	12	100%	12	100%	12	100%	0	0	0	0
Other than Permanent workers											
Male	555	555	100%	555	100%	0	0	555	100%	0	0%
Female	We currently have not employed any female contractual workers										
Total	2238	2238	100%	2238	100%	12	100%	2226	100%	0	0%

2. Details of retirement benefits.

Benefits	FY2022			FY 2021		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	As per the ESIC Act	As per the ESIC Act	Y	As per the ESIC Act	As per the ESIC Act	Y
Others - please specify	We currently do not offer any other benefits apart from those mentioned above					

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard?

At our Airoli office, we provide designated restrooms and other facilities for employees with disabilities. In the future, we plan to design our new workplaces to meet the specific needs of differently abled employees.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Yes, we have a global equal employment opportunities policy which is also extended to India operations. All employees' distinct characteristics and opinions are valued. Everyone is treated and given equal opportunities for employment regardless of race, color, religion, gender, sexual orientation, national origin, age, disability, veteran, married or domestic partner status, citizenship, familial affiliation, or any other comparable feature.

Link: <https://www.huhtamaki.com/en/sustainability/reports-and-policies/code-of-conduct/>

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

[UN SDG: 5.1,5.4,8.5,8.6]

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention work rate
Male	100%	100%	100%	100%
Female	100%	100%	100%	100%
Total	100%	100%	100%	100%

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.

[UN SDG :16.6]

<i>(If yes, then give details of the mechanism in brief)</i>	
Permanent Workers	Huhtamaki has an open speak up culture where employees are encouraged to reach out to their managers or managers' manager or the human resources department or the India investigation lead or the audit committee chair or compliance team or the speak up channel to report their grievances. In addition, there are various forums where they may seek help depending on the nature of their grievance. For example, if the grievance is in the nature of sexual harassment, Huhtamaki has an Internal Complaints Committee that handles complaints of such nature. Please refer to Principle 5 for more information.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

7. Membership of employees and worker in association(s) or Unions recognized by the listed entity:

[UN SDG: 8.8]

Category	FY2022			FY 2021		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	1223	0	0%	Since Huhtamaki started tracking the data from this FY onwards, we are only able to provide data pertaining to FY2022		
Male	1066	0	0%			
Female	157	0	0%			
Total Permanent Workers	1683	547	32.50%			
Male	1671	547	32.73%			
Female	12	0	0%			

8. Details of training given to employees and workers:

[UN SDG: 4.3,5.1,8.2,8.5,10.3]

Category	FY2022				FY 2021					
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Permanent employees and workers										
Male	2735	1801	65.85%	1861	68.04%	We have started recording the number of participants for training on health and safety and skill upgradation from FY2022.				
Female	171	55	32.16%	115	67.25%					
Total	2906	1856	63.87%	1976	67.99%					
Contractual employees and workers										
Male	We do not differentiate between contractual and permanent workers when it comes to health & safety management. All our contractual workers undergo job relevant trainings on Health & Safety.									
Female										
Total										

9. Details of performance and career development reviews of employees and worker:

[UN SDG: 4.3,5.1,8.5,10.3]

Category	FY2022			FY 2021		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	975	975	100%	897	897	100%
Female	67	67	100%	61	61	100%
Total	1042	1042	100%	958	958	100%
Workers						
Male	1690	1690	100%	1278	1278	100%
Female	12	12	100%	-	-	100%
Total	1702	1702	100%	1278	1278	100%

10. Health and safety management system:

[UN SDG: 3.3,3.5,3.8,8.8,16.7]

- Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?**
Yes. We have an occupational health and safety management system that has been implemented and covers all our permanent and contractual employees and workers.
- What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**
All units undertake hazard identification and risk assessment programs each year to ensure mitigation of risks on the respective sites. The risk assessments are done for both routine as well as non-routine activities. Additionally, learnings and input on implementation of controls on specific risks are also taken from the global locations and teams and implemented as applicable. Training is conducted for employees periodically on the procedure and process to be followed for risk assessments so as to ensure the accuracy of the same. The risk assessments are driven by the site leadership team and the action plan to mitigate risks is monitored by them.
- Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks.**
Yes, near miss reporting, unsafe acts and unsafe conditions reporting is a formalized process at all units and workers are encouraged to report any hazards or risks. The closure of these identified risks is also monitored monthly and reviewed centrally.
- Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?**
Yes, the company conducts periodic health checkups for all its employees and even for the new employees on top of that. The company provides health insurance for all permanent employees. A support system for mental health and psychological welfare has been set up and employees are encouraged to avail themselves of the same if required.

11. Details of safety related incidents, in the following format:

[UN SDG: 3.3,3.4,3.6,3.9,8.8,16.1]

Safety Incident/Number	Category	FY2022	FY 2021
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.98	0.09
Total recordable work-related injuries	Employees	0	0
	Workers	16	5
No. of fatalities	Employees	0	0
	Workers	1 (contractual worker- not on the company's payroll)	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

[UN SDG: 3.6,8.8,16.1]

Our Company has a thorough health and safety policy that is implemented at all organizational levels. Our company is dedicated to implementing and minimizing strict controls over all pertinent health and safety issues. As part of the induction process, which is repeated frequently, all new employees get site- and job-specific health and safety training. The unit head of each location and their leadership team are in charge of the health and safety management program. Performance is assessed at the national level by the Managing Director and Head of Operations. Examining both leading and lagging indications, as well as applying lessons learned from accidents to all sites. The implementation of proactive measures, such as reporting and closing near-miss incidents, identifying opportunities for safety improvement, audits, leadership walks, and so on. To involve employees and workers, important awareness campaigns on crucial subjects including hand safety, fire safety, working at heights, and process safety are held each month. Through daily checks, toolbox discussions, and standard operating procedures, line management oversees the daily implementation of health and safety measures. Additionally, our business places a strong emphasis on making sure that all contract workers are fully included in health and safety programs.

13. Number of complaints on the following made by employees and workers

[UN SDG: 16.6]

	FY2022				FY 2021			
	Filed the year	during the year	Pending resolution at the end of year	Remarks	Filed the year	during the year	Pending resolution at the end of year	Remarks
Working Conditions	We have received zero (0) complaints from employees and workers on working conditions and health and safety. We are continually revising our health and safety regulations in response to changing work requirements and upgrading the technologies we use to ensure that health and safety remains a top priority for us.							
Health & Safety								

14. Assessments for the year

	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	43%
Working Conditions	43%

Six of our factories are certified for ISO 45001 and are audited as per their requirements by third party agencies. We will be implementing ISO 45001 certification for remainder of the units as well in the coming year. Additionally, our manufacturing units are audited for health and safety management requirements under the Factories Act.

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

[UN SDG: 8.8]

Every safety-related occurrence is given a root cause analysis, and the information gathered is analyzed. After that, the necessary corrective and preventative actions are implemented in the affected area, and then they are deployed in all other relevant units. Investigations are conducted into all incidents that have taken place inside the group globally, and any lessons learned are put into practice. For instance, the implementation of a gap analysis and mitigation program that covered work at height at each site was spurred by the company's global sites. Action plans are developed in these circumstances, and closure is followed until it is complete.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

[UN SDG: 5.4,8.5]

Yes, our company extends life insurance or any compensatory package in the event of death of Employees/ Workers.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

Respective sites conduct due-diligence to ensure that statutory dues are paid by relevant value chain partners. Evidence regarding actual transfer of dues is collected and timely payment of dues is ensured. Our internal audits also check on this aspect on a sample basis and if any concern is identified, the same is addressed immediately.

3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY2022	FY 2021	FY2022	FY 2021
Employees	0	0	0	0
Workers	1 (third-party worker)	0	0	0

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

[UN SDG: 4.3,8.5,10.3]

Currently, we do not offer transition assistance programs to retired or terminated employees. We will consider offering assistance in appropriate cases in future.

5. Details on assessment of value chain partners:

[UN SDG: 5.2,8.8,16.1]

We do not have any assessments for our value chain partners yet, however, we understand the importance of this subject and are aiming to initiate such programs in the coming years.

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

[UN SDG: 3.6,8.8,16.1]

Not applicable as per the statement quoted above.

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders



For Huhtamaki, primary stakeholders include the government, shareholders, consumers, suppliers, investors, and communities who are seeking to learn more about our sustainability performance in various areas. It has become vital for us to continue recording and disclosing both quantitative and qualitative indicators in order to exhibit transparency and communicate clearly with all of them and address the sustainability issues that are critical to the business's performance. Collaboration and co-creation with stakeholders are essential to accomplish our sustainability goals. Stakeholder dialogue not only helps us match our objectives and activities with the expectations of diverse stakeholder groups, but it also provides us with valuable information about the probable risks and possibilities associated with our operation.

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

[UNSDG: 16.7]

To identify stakeholders and communicate with them, we employ a variety of tools and techniques, including both structured and ad hoc methods. In our materiality assessments, for instance, we use surveys like the global employee engagement survey and the stakeholder survey.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

[UNSDG: 16.7]

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and regulatory authorities	No	Personal meetings, industry associations, E-mail, website, postal communication, panel meetings, conferences, facility visits.	Periodically event based	or Advocacy, Compliance assurance, thought leadership, preparing representation on policy matters as may be needed
NGOs	No	E-mails, community meetings	Periodically required	as To Understand community's social and other needs, partnering to deliver impact through various CSR activities
Academia	No	E-mails, official meetings	No defined periodicity	Talent acquisition and talent management, communicate vision and strategy of the company, research and development activities, nurture talent and afford opportunities
Employees	No	Physical and virtual meetings, e-mails, notice boards, town-halls, internal websites, digital tools, Employee engagement surveys, Appraisals, Reward & recognition programs, grievance mechanism	Weekly, monthly, quarterly, half yearly, annually	Performance and talent management, build a safe and inclusive working culture, communicate vision and strategy of the company, seek feedback
Customers	No	Physical and virtual meetings, e-mail, bidding tools, website, site visits	Frequently as required	To understand customer's vision and strategy, value proposition, customer expectations, improve business, participation in tenders, commercial negotiations, explore R&D opportunities, ensure prompt service to the customers, seeking feedback, addressing concerns or grievances if any
Suppliers	No	Physical and virtual meetings, e-mail, bidding tools, website, site visits for audit or other purposes	Frequently as required	Share our vision and strategy, due diligence of supplier to understand the supplier's footprint, capability, credibility, value system, sustainability capability, bidding process, commercial discussion and negotiation, ensure business continuity,
Local community	Yes	Through CSR initiatives	Periodically	To understand the needs of the local community, support the communities on social needs

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors	No	Website, financial reports, Stock Exchange, investor communications via emails, and grievance redressal mechanisms	Quarterly, half yearly, annually, event based	Communicate financial results/material occurrences.
Shareholders	No	Website, financial reports, Stock Exchange, investor communications via emails, and grievance redressal mechanisms	Quarterly, half yearly, annually, event based	Communicate financial results/material occurrences, as well as a grievance redressal process.

Leadership Indicators

4. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how feedback from such consultations is provided to the Board.

[UNSDG: 16.7]

Huhtamaki is aware of the importance of discussion of ESG topics between our stakeholders and the Board. Matters relating to ESG are discussed at meetings of the Corporate Social Responsibility Committee. The Company plans to improve the rigor and focus on ESG related matters in the coming year.

5. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the input received from stakeholders on these topics were incorporated into the policies and activities of the entity.

At Huhtamaki, we have a broad level of understanding of our stakeholders' expectation in terms of identifying and managing the social and environmental performance of our company. It is considered as an important part of our agenda while communicating with the different key stakeholders of our company, which highly influences our policies and procedures to ensure our business operations are in alignment with the company's vision, mission and stakeholders' expectations

6. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

We did not have any instances where in any concern was raised by any vulnerable/marginalized stakeholders. As part of our CSR initiatives, we engage with various vulnerable/marginalized groups and the social initiatives are aimed at bringing a positive impact on the lives of the people from said stakeholder groups.

[UNSDG: 16.7]

Principle 5: Businesses should respect and promote human rights



Our foremost priority is to provide a healthy, safe, and inclusive working environment for our employees. We promote and extend human right policies and benefits to not only our employees but also to our value chain partners. We are dedicated to constant development and have begun taking steps to effectively incorporate human rights into our operations and to establish a structure for managing human rights in a more systematic manner.

Our social responsibility efforts are focused on providing decent working conditions throughout all of our worldwide businesses, protecting human rights of all our stakeholders, and guaranteeing fair employment practices for everyone, everywhere. We invest in talent development and incorporate diversity and inclusion into how we work. We are dedicated to being excellent corporate citizens who have a positive influence on the communities in which we operate.

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

[UN SDG: 4.3, 8.5, 8.8, 10.3, 16.5, 16.7]

Category	FY2022			FY 2021		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	1223	1064	87%	Huhtamaki started tracking the data from FY 2022 onwards		
Other than permanent	-	-	-			
Total employees	1223	1064	87%			
Workers						
Permanent	1683	1495	89%	Huhtamaki started tracking the data from FY 2022 onwards		
Other than permanent	-	-	-			
Total workers	1683	1495	89%			

2. Details of minimum wages paid to employees and workers, in the following format

[UN SDG: 1.2, 5.1, 8.5, 10.3]

Category	FY2022				FY 2021					
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent	1042	-	-	1042	100%	958	-	-	958	100%
Total employees	1042	-	-	1042	100%	958	-	-	958	100%
Workers										
Permanent	1126	-	-	1126	100%	1278	-	-	1278	100%
Total workers	1126	-	-	1126	100%	1278	-	-	1278	100%

3. Details of remuneration/salary/wages, in the following format:

[UN SDG: 16.7]

Particulars	(Amount in INR)			
	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	2	20,707,034	0	0
Key Managerial Personnel	1	5,857,601	0	0
Employees other than BoD and KMP	1063	56,920	157	63,714
Workers	1671	37,881	12	20,504

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Huhtamaki's dedication to human rights is reflected in the Global Human Rights Policy, which takes into account Huhtamaki's Code of Conduct and also, the United Nations International Bill of Human Rights as well as the UN Guiding Principles on Business and Human Rights. Depending on the nature of the allegation and people involved, the Board of Directors or any person authorized by them or the Human Resources department, as the case may be, will be focal point for addressing human right impacts.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

[UN SDG: 16.6]

Our Code of Conduct sets out the standards of ethical behaviour for all employees and members of the management, as well as all officers and directors (including independent directors). The Code is designed to provide a broad and clear understanding of the minimum conduct standards expected of every employee, around the world wherever Huhtamaki does business. Huhtamaki is committed to complying with laws and regulations and to acting in accordance with commonly accepted best practices. Violation of any laws or regulations, including any participation in illegal acts or unethical dealings are not accepted. Huhtamaki has zero tolerance to harassment of any kind, including sexual harassment, racial harassment and any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating. Huhtamaki will investigate every allegation and if they are found true, take all necessary disciplinary actions facilitated by local legislation, including termination of employment, against anyone violating this prohibition. A violation may also result in criminal and civil sanctions.

6. Number of Complaints on the following made by employees and workers:

[UN SDG: 5.1,5.2,8.7,8.8,16.2,16.6]

	FY2022			FY 2021		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	1	0		0	0	
Discrimination at workplace	0	0		0	0	
Child Labor	0	0		0	0	
Forced Labor/ Involuntary Labor	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	7	0		0	0	

There was one complaint of sexual harassment filed during the year which was addressed by the Internal complaints committee and resolved successfully. There were 7 anonymous complaints alleging harassment at the workplace. The complaints were investigated thoroughly and resolved. Huhtamaki is taking steps to ensure that all our employees feel safe and secure at their workplace.

7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

[UN SDG: 16.6]

Our Code of Conduct and Whistleblowing Policy which is applicable to every employee prescribes zero tolerance to retaliation and strict action against any person indulging in retaliatory practices. Trainings on the Code of Conduct and Whistleblowing Policy reiterate and stress the importance of the No Retaliation principle.

Link to policies

<https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies>

8. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

[UN SDG: 5.2,8.8,16.1,16.7]

Yes. Various elements of human rights aspects are incorporated into our business agreements and contracts. We have global human rights policies that demonstrate Huhtamaki's commitment to human rights as outlined in the United Nations International Bill of Human Rights, as well as the UN Guiding Principles on Business and Human Rights due diligence process built to identify and mitigate risks in the supply chain.

9. Assessments of the year

[UN SDG: 5.2,8.7,16.2]

	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	At Huhtamaki, we adhere to the national and international regulations that govern Human rights issues at the workplace, which are extended at the plant level as well. We make sure that none of our plants have any cases of Child labor, forced labor, discrimination, or sexual harassment. However, we have not assessed this with a third-party agency yet.
Forced/involuntary labor	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Please refer to the response above.

Leadership Indicators

11. Details of a business process being modified/introduced due to addressing human rights grievances/complaints.

[UN SDG: 16.6]

No such modifications have been implemented as we had no cases that required modification.

12. Details of the scope and coverage of any Human rights due diligence conducted

Many FMCG companies across the globe has formed a consortium called AIM PROGRESS (PROGRAM on RESPONSIBLE SOURCING) –. The process of verification / audit of compliance is called SEDEX (SUPPLIERS ETHICAL DATA EXCHANGE) and the Model Responsible Sourcing Audit is call SMETA (SEDEX Members Ethical Trade Audit). The current applicable model is identified as SMETA 6.1. Most of these FMCG companies are customer of Huhtamaki India , and all customers are quite strict towards SEDEX Compliance.

The scope areas of SMETA audit are (a) Business Integrity (b) Health & Safety (c) Labor (d) Environment . Human Rights aspects are well integrated in these audits, under the above said topics. There is a prescribed audit checklist for the audit , where in the auditors will look for compliance to applicable local law and /or the customer specific requirement, whichever is stricter. This certification can be done using the services of approved certifying agencies. There are many customers , who are not member of SEDEX , but still acknowledges the process. There are few customers who have their own model , which is similar to SMETA. For those customer applicable conversion of report is done by the certification body engaged .

SMETA 6.1 audit doesn't lead to any certification. Individual customer is expected to review the audit report of the site and provide a compliance validity. Minimum Compliance (once the audit is done , and closures done within stipulated time) is for 1 year , and maximum can be 3 years. As a good practice , Huhtamaki India ensures that all its site (flexibles and labels) undergo SMETA audit at least once a year. Except Ambernath labels unit , which got commissioned very recently , all plants have gone through the requisite audit in last on year and put in due diligence for closure of the findings.

13. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

We provide dedicated washrooms and other amenities for differently abled visitors at our Airoli office. In the future, we are planning to design our new offices as per the customized requirements and suitability of differently abled visitors.

14. Details on assessment of value chain partners:

[UN SDG: 5.2,8.7,8.8,16.1]

	% Of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	Our Code of Conduct for Suppliers covers topics related to business ethics, as well as social and environmental responsibility. A key element of Huhtamaki's due diligence processes is the use of
Discrimination at workplace	
Child labor	the NAVEX RiskRate tool. All key suppliers are screened in RiskRate against sanction lists, watchlists, Politically Exposed Persons lists and adverse media. The screening continues for as long as the supplier is an active key supplier for Huhtamaki. If there are any matches in the abovementioned lists, RiskRate will automatically alert us with more case details.
Forced/involuntary labor	
Wages	
Others – please specify	Based on the suppliers' initial profile risk level, they are also sent a questionnaire. All suppliers are asked to acknowledge compliance with the updated Code of Conduct for Huhtamaki Suppliers. Medium risk suppliers are asked questions that help assess the risk of corruption and compliance with law. Possible high-risk suppliers receive additional questions on sanctions as well as ethics and compliance. We have defined risk scorings for the questions, and if necessary, each questionnaire answer is checked individually to determine whether further actions or explanations are required from the supplier. Both the screening results and the answers to the questionnaire are combined in the final risk rating of the supplier. This final risk rating also uses a three-level system: low, medium or high risk. We have defined internal processes for the review and approval of the results, which vary, depending on the risk level.

15. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

[UN SDG: 5.2,8.7,8.8,16.1]

There are no significant risks or concerns as reported above.

Principle 6: Businesses should respect and make efforts to protect and restore the environment

With a growing emphasis on the welfare of the planet, packaging also plays an important role in decreasing food waste, which is still by far the most significant environmental impact from food systems on climate change. We updated the Huhtamaki Group Environmental Policy to reflect our commitment to protecting food, people, and the environment via sustainable packaging solutions. The policy's objective is to ensure that everyone in the organization understands our environmental obligations. It addresses climate and energy; water and effluent; sustainable forestry and biodiversity; waste, circular design, and chemicals. Through innovation, we intend to raise awareness and build the infrastructure needed to recycle and eradicate packaging waste in the environment, which will not only benefit all the stakeholders but also the ecosystem at large.

Essential Indicators**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

[UNSDG: 7.2, 7.3, 8.4, 12.2, 13.1]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
Total electricity consumption (A) (in MJ)	272,544,469	267,441,385
Total fuel consumption (B) (in MJ)	213,645,216	209,513,031
Energy consumption through other sources (C) (in MJ)	0	0
Total energy consumption (A+B+C) (in MJ)	486,189,685	476,954,416
Energy intensity per rupee of turnover (MJ/ INR Millions)	16,670.31	18,167.75

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

As a part of our global reporting, we undergo third party assurance for our environmental reporting every year.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

[UNSDG: 7.2, 8.4 12.2, 13.2]

Huhtamaki has not identified any of their sites or facilities as designated consumers and hence we are not qualified for Performance, Achieve and Trade (PAT) Scheme of the Government of India.

3. Provide details of the following disclosures related to water, in the following format:

[UNSDG: 6.3, 6.4, 12.4]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
Water withdrawal by source (in kiloliters)		
(i) Surface water	787.00	0
(ii) Groundwater	64,541.15	110,529.35
(iii) Third party water (Municipal water supplies)	101,817.53	84,696.25
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	167,144.68	195,225.60
Total volume of water consumption (in kiloliters)	167,144.68	195,225.60
Water intensity per rupee of turnover (KL/ INR Millions)	5.60	7.43

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

[UNSDG: 6.3, 6.4, 6.A, 12.4]

Yes, we have put in place a system to achieve zero liquid discharge, and 10 of our 14 facilities already operate at that level. By 2025, we aim to have achieved zero liquid discharge in every one of our units.

To maximize the internal consumption of treated water, sewage generated on site is treated in a sewage treatment plant or an effluent treatment plant. To ensure adherence to standards for discharge, tests are performed on the treated water's output.

5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

[UNSDG: 3.9, 12.4, 14.3, 15.2]

Parameter	Please specify unit	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
NOx	KG	1,173.38	1,061.45
SOx	KG	821.36	743.02
Particulate matter (PM)	We will setup the required mechanisms to record Particulate matter, Persistent organic pollutants, Volatile organic compounds, Hazardous air pollutants and Others - Ozone Depleting Substances in the coming years.		
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others - Ozone Depleting Substances (HCFC - 22 or R-22)			

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

[UNSDG: 3.9, 12.4, 13.1, 14.3, 15.2]

Parameter	Unit	FY2022 (Current Financial Year)	*FY 2021 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	MT CO ₂ e	14,251	15,609
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	MT CO ₂ e	53,920	53,841
Total Scope 1 and Scope 2 emissions per rupee of turnover	(Ton/INR Millions)	2.28	2.64

7. Does the entity have any project related to reducing Greenhouse Gas emission? If yes, then provide details.

[UNSDG: 3.9, 7.2, 12.4, 13.1, 14.3, 15.2]

By the year 2030, we intend to have achieved carbon-neutral production for scope 1 and scope 2 emissions. We are working on several projects throughout the locations to reduce energy use and the resulting GHG emissions while increasing the proportion of renewable energy. For instance, Sricity's factory uses biofuel. Implementing rooftop solar in four facilities, switching to cleaner PNG fuel in the Rudrapur factory, and reducing electricity consumption across all sites

8. Provide details related to waste management by the entity, in the following format:

[UNSDG: 3.9, 6.6, 8.4, 11.2, 11.6, 12.4, 15.1]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	9,857	9,910
E-waste (B)	4.1	6.5
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	NA	NA
Battery waste (E)	6.9	5.8
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (Chemical, chemical storage drums) (G)	1,276	1,177
Other Non-hazardous waste generated (H). Please specify, if any.	8,081 (majorly includes Paper waste, stationary waste, organic waste)	5,714
Total (A+B + C + D + E + F + G + H)	19,926	16,813

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste		
(i) Recycled	18,890	15,783
(ii) Re-used	0.14	234
(iii) Other recovery operations	227.86	0
Total	19,118	16,017

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of waste		
(i) Incineration	89	332
(ii) Landfilling	19	464
(iii) Other disposal operations		
Total	108	796

9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

[UNSDG: 3.9, 6.3, 6.6, 8.4, 11.6, 12.4]

The company closely monitors the waste generated in each of its units and has a strong program to reduce and then treat the waste generated in an environmentally friendly and legally compliant manner. All hazardous and non-hazardous wastes are tracked, reported, and analyzed monthly. Specific targets for waste reduction are taken at each unit and the action plan is tracked through the year.

The company has declared 2030 ambitions on recycling of hazardous waste and reduction in landfilling and the company is maintaining a robust performance on these targets. For hazardous waste, material consumption optimization projects are undertaken to reduce waste at source. The generated waste is treated as per local regulatory requirements.

10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

[UNSDG: 6.6, 14.2, 15.1, 15.5]

No, Huhtamaki does not operate in any ecologically sensitive areas as identified by government bodies.

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

[UNSDG: 6.3, 6.A, 12.4]

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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No, we have not conducted an environmental impact assessment for any projects.

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the noncompliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken if any
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Yes, we abide by all applicable environmental laws, rules, and directives in India. To verify our adherence to the law, we use an internal program called LEXCARE. Monthly compliance audits are conducted. We additionally receive accreditation from external labs.

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

[UNSDG: 7.2, 7.3, 8.4, 12.2, 13.1]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
From renewable sources		
Total energy consumed from renewable sources (A+B+C) (in MJ)	26,557,752	3,109,244
From non-renewable sources		
Total energy consumed from non-renewable sources (D+E+F) (in MJ)	459,631,933	473,845,171

2. Provide the following details related to water discharged:

[UNSDG: 6.3]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water	2,845	18,206
- No treatment	0	0
- With treatment – please specify level of treatment	2,845	18,206
(ii) To Groundwater	38,021	58,479
- No treatment	0	5,629
- With treatment – please specify level of treatment	38,021	52,850
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties	0	548
- No treatment	0	548
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kiloliters)	40,866	77,233

3. Water withdrawal, consumption, and discharge in areas of water stress (in kiloliters):

For each facility / plant located in areas of water stress, provide the following information:

(i) Name of the area:

(ii) Nature of operations

(iii) Water withdrawal, consumption, and discharge in the following format

[UNSDG: 6.3]

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)
Water withdrawal by source (in kiloliters)		
(i) Surface water	Not applicable as we do not have any plants/facility in water stressed areas as mentioned by government bodies	
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kiloliters)		
Total volume of water consumption (in kiloliters)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		

Parameter	FY2022 (Current Financial Year)	FY 2021 (Previous Financial Year)		
Water discharge by destination and level of treatment (in kiloliters)				
(i) Into Surface water	Not applicable as we do not have any plants/facility in water stressed areas as mentioned by government bodies			
- No treatment				
- With treatment – please specify level of treatment				
(ii) Into Groundwater				
- No treatment				
- With treatment – please specify level of treatment				
(iii) Into Seawater	Not applicable as we do not have any plants/facility in water stressed areas as mentioned by government bodies			
- No treatment				
- With treatment- please specify level of treatment				
(iv) Sent to third parties				
- No treatment				
- With treatment- please specify level of treatment				
(v) Others	Not applicable as we do not have any plants/facility in water stressed areas as mentioned by government bodies			
- No treatment				
- With treatment- please specify level of treatment				
Total water discharged (in kiloliters)				

4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

[UNSDG: 3.9, 12.4, 13.1, 14.3, 15.2]

Huhtamaki does measure Scope 1 & 2 emissions, but we have not started measuring our Scope 3 emission yet. However, we are aiming to measure our scope 3 emissions in future. At present, we are streamlining our Scope 1 & 2 while also identifying the various avenues of scope 3 emissions which will help us in measuring it going forward.

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

[UNSDG: 6.6, 14.2, 15.1, 15.5]

We do not have any offices/ plants/ operation facilities in ecologically sensitive areas as mentioned by government authorities.

6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

[UNSDG: 8.4, 11.6, 12.2, 12.4]

In our 2030 ambitions, we have committed to carbon neutral production (Scope 1 and 2). While on one end, we are working to switch to renewable energy, on the other hand, we are also taking actions to optimize and reduce our energy consumption, thus mitigating GHG emissions at source. When it comes to energy conservation, even small initiatives taken across the operations together bring in a lot of benefits. All our manufacturing units are undertaking various projects for both fuel and electricity consumption reduction. A few examples: Rudrapur factory shifted to a cleaner PNG fuel which is also more efficient. Our Hyderabad factory implemented VFD for ventilation units and cooling towers and installed motion sensors for air curtains and lights; the Guwahati factory has optimized the use of compressed air to conserve energy consumption. Implementing LED lighting and installing energy-efficient pumps are initiatives taken across all units.

7. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

We have a policy in place at the global level which is also applicable to our Indian operations as well.

Link: <https://www.huhtamaki.com/en/investors/corporate-governance/risk-management/>

8. Disclose any significant adverse impact to the environment arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?

At Huhtamaki, we are aware and mindful of our actions, especially in terms of any adverse impact that may occur due to our value chain operations. At present we have not identified any significant adverse impacts caused due to this. However, going forward we are aiming to initiate the process of monitoring any such significant impacts as per the global standards.

9. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

We constantly monitor our value chain partners and assess their awareness and involvement in actual / potential negative environmental impacts. However, we do not have an official assessment practice for our value chain partners.

Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent



Huhtamaki as an organization is committed to build a capacity in the coming years to do the best for the largest number of people and markets, we operate in. We wish to engage in public policy advocacy to promote awareness of our organization's mission, mobilize our people, and get favorable attention from all our stakeholders.

We conduct our business in the most ethical way possible, with the goal of not only reducing gender disparities but also of being a fair and inclusive workplace. We want to make the best use of our technology and invest the most in research and innovation to make our manufacturing activities more sustainable and combat various challenges related to climate, emissions, water, and biodiversity.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations

The major affiliations with trade and industry chambers/associations are with Indian Flexible Packaging and Folding Carton Manufactures Association (IFCA), Flexible Packaging Industrial and Trader Association, Bombay Chamber of Commerce and Industry (BCCI), FINCHAM, India Plastic Pat, The Council of EU Chambers of Commerce in India, We Care.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Indian Flexible Packaging and Folding Carton Manufactures Association (IFCA)	National
2	Flexible Packaging Industrial and Trader Association	National
3	Bombay Chamber of Commerce and Industry (BCCI)	National
4	FINCHAM	International
5	India Plastic Pact	National
6	The Council of EU Chambers of Commerce in India	International
7	We Care	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

[UN SDG: 16.3]

No corrective action taken or underway on any issues based on adverse orders from regulatory authorities as there were Zero (0) cases related to anti-competitive conduct. The Global Ethics and Compliance function manages the company's Ethics and Compliance program's execution by advising and supporting the conduct of business with high integrity and in compliance with laws and regulations.

Leadership Indicators

1. Details of public policy positions advocated by the entity

[UN SDG: 16.5]

We do not have a policy on public advocacy yet. However, as per NGRBC guidelines we shall soon be devising a policy on this. We do take part in advocating and participate in public advocacy initiatives through industry associations such as India Plastics Pact and We care.

Principle 8: Businesses should promote inclusive growth and equitable development



Decades of globalization and technical progress have resulted in rapid economic development, but the advantages have been disproportionately distributed. Huhtamaki, as an organization, seeks to tackle this disparity, which has intensified not just economic and social insecurity, but also global concerns. We are focusing extensively on embedding Inclusive Growth into key business decisions and are also striving to provide a framework for our company and investors.

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

[UNSDG: 1.4, 2.3, 9.1, 9.4, 11.2]

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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We are currently not undertaking any social impact assessments for India operations.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

[UNSDG: 1.4, 2.3, 9.1, 11.2]

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% Of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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We do not have any operations/facilities/plants/offices that include land acquisition from affected/displaced landowners, hence we do not have any projects that involve Rehabilitation and Resettlement (R&R).

3. Describe the mechanisms to receive and redress grievances of the community.

Community stakeholders may use any of the available channels of communication to raise grievances, if any. Concerns received from community stakeholders are immediately responded on and resolved satisfactorily. Complaints received from the said stakeholders are placed before the respective Committees, which are responsible for monitoring and reviewing the mitigation of any such concerns raised.

[UNSDG: 1.4, 2.3, 9.1, 9.4, 16.6]

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

[UNSDG: 8.3]

	FY2022 Current Financial Year	FY 2021 Previous Financial Year
Directly sourced from MSMEs/ small producers	3%	3.2%
Sourced directly from within the district and neighbouring districts	We do not have visibility on the exact supplier units which are used to supply material to our premises and hence it is difficult to exactly comment on this.	

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

[UNSDG: 1.4, 2.3]

Not applicable as per the above statement.

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

[UNSDG: 1.4, 2.3]

S. No.	State	Aspirational District	Amount spent (In Rs.)
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We have not undertaken any CSR projects in designated aspirational districts as identified by government bodies

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No, currently we do not have a preferential procurement policy to give preference to purchase from suppliers comprising marginalized /vulnerable groups.

- (b) From which marginalized /vulnerable groups do you procure?

Currently we are not procuring our raw material from people belonging to marginalized/vulnerable groups as defined by NGBRC

- (c) What percentage of total procurement (by value) does it constitute?

[UNSDG: 8.3, 11.2]

Not applicable as stated in clause 2 (b)

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

[UNSDG: 8.1, 9.1, 9.5]

We do not have any Intellectual Property Rights owned or acquired by us based on Traditional Knowledge

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

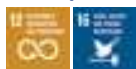
Not applicable as per the statement above.

6. Details of beneficiaries of CSR Projects:

[UNSDG: 1.4, 2.3]

S. No.	CSR Project	No. of persons benefited from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups
1.	We collaborated with Need Base India a non-governmental organization in Bengaluru to assist underprivileged girls who live on urban streets and indulge in antisocial activities. This program aims to provide such girls with suitable education and schooling opportunities while also protecting them from being trafficked and exploited. We have also tried to eliminate extreme hunger, acute poverty, and families battling to acquire a meal by providing groceries, and to achieve their desire of sending their children to school.	160 underprivileged Girls	95% of Girls are from Vulnerable & Marginalized Groups
2.	a. Our Taloja facility supplied RO water purifiers to two rural schools in the Raigad district, ensuring that every child has access to clean and safe drinking water. b. We provided Solar Lamps to two Gram Panchayat Schools/Local Villages, Raigad ZP School at Khanacha Bangla (Adivasi School) and Raigad ZP School at Wanvanje.	220 Students	18% of the students belong to marginalized communities.
3.	In 2022, Huhtamaki India settled to a Trust established with the objective of recycling post-consumer use Multi layered plastic (MLP) packaging waste. Post-consumer MLP waste collected from the city of Pune is cleaned, segregated and recycled by the Trust to form granules which can be then used to manufacture value added items. MLP waste is thought to be non-recyclable and ends up in landfills and garbage dumps.	N/A	N/A

Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner



At Huhtamaki, we understand that client satisfaction is the clearest path to success. We have launched various transformational sustainable packaging solutions globally to meet the rising demand for sustainable packaging solutions from our customers and their consumers. We strive for excellence and collaboration within our business divisions and functions to give the best to our customers as we imbibe that demonstrating shared values with the customers leads to more goals being achieved on the sustainability.

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

[UN SDG: 16.6]

We bifurcate the customer complaints we receive into two categories - (a) Online Rejection, which is a small quantity of defect typically at the end or beginning of the coil (b) Complaint, which is a deviation from Specification and or stated/implied condition (including packing condition, documentation requirement etc). Huhtamaki India has NCMS (non-conformance management System) portal where the complaints are logged in. As a first point of contact, the Sales team receives the information from the customer. Based on the details received, the sales team decides whether to record the same under Online Rejection or Complaint.

- 1) Online Rejection - typically this is registered for a period of time over many invoices. There may be multiple reasons for these rejections. Once the same is registered into NCMS portal, the same reaches to the Quality Control (QC) head. On verification the QC head accepts or rejects the same

- 2) Customer Complaint - Typically this is registered against a specific invoice. At times, there may be few consecutive invoices. Once the sales representative registers the same, the same is delivered to QC head, who checks it for its genuineness. At times, the plant representative visits the Customer's site to understand what actually the issue. Based on the initial interaction, the QC head accepts or rejects the complaint. Once accepted, the response to customer, through sales representative, is done within 15 working days. The response includes a thorough Root Cause Analysis, Corrective Action(s), and Preventive actions(a). The QC head of the plant is responsible for assigning the identified Corrective Action(s), and Preventive Action(s) to various colleagues. Closure of these actions are confirmed to QC head. Then, upon verification of the supplies (post closure of all actions), the Quality Assurance head closes the complaint.

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

	As a percentage to total turnover
Environmental and social parameters relevant to the product	Since we are into manufacturing tailor made packaging solutions for our customers, who in turn use our products for packing their products, it is their discretion to include information about environmental and social parameters, safe and responsible usage, and recycling or disposal methods as per the nature of their product and its specifications.
Safe and responsible usage	
Recycling and/or safe disposal	

[UN SDG: 12.8]

3. Number of consumer complaints in respect of the following:

	FY2022 (Current Financial Year)		Remarks	FY 2021 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	We have not received any Customer complaints under any of the categories mentioned. We aspire to be the most reliable solutions-focused partner for our clients by exceeding their expectations in areas such as sustainability, digitalization, and personalization. We stand at 100 % digitization of all customer transactions worldwide, which drives us to strengthen our robust framework of consumer data protection and cyber security on a regular basis.					
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

[UN SDG: 16.3,16.10]

4. Details of instances of product recalls on account of safety issues:

	Number	Reasons for recall
Voluntary recalls	We design and create customized solutions for our customers; hence we have no record of forced or voluntary recalls due to safety concerns.	
Forced recalls		

[UN SDG: 16.3]

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

[UN SDG: 16.3, 16.10]

Yes. One of the most important aspects in business growth is customer retention. Maintaining brand loyalty and reputation through a strong cyber security position is paramount for customers today. Our strong policies on data privacy and cyber security ensures protection against internal and external threats

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

We have appointed a global security manager who is a one-point contact and who oversees, develops, and executes a consistent approach for collecting security incident reports, evaluating them, and successfully communicating them to leadership. We aim to

increase security awareness by installing relevant solutions, disseminating security information, and delivering training on various issues to our workforce. For instance: To avoid the theft of personal and sensitive information, the team deploys phishing detection and e-mail security solutions.

Leadership Indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

Our website outlines details about our products and services and the weblink for the same is as follows

<https://www.huhtamaki.com/en-in/flexible-packaging/contact-us/>

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

[UN SDG: 12.8, 16.3]

We develop packaging solutions for our customers based on their product specifications and requirements, and we demonstrate usage and safety risks before they are used. Any questions or concerns are addressed by key account managers as and when they arise.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

We have been extremely proactive in notifying customers of any possibility of disruption/discontinuation of vital services, and we have an appropriate framework in place to do so. Increased interruptions from man-made and natural disasters endanger corporate operations. Following any such interruptions, we ensure recovery and availability of corporate applications and infrastructure has our continued service delivery. Also, when such an incident occurs, emailers are immediately sent to consumers by their individual account managers.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief.

[UN SDG: 12.8,16.3]

The Company follows all applicable product labeling requirements and displays pertinent information as required by law and per the customer's specifications/instructions. The Company manufactures/supplies packaging materials which are customized as per customer requirements; hence product information rules do not apply to the Company. However, the marking and labeling requirements under the Plastic Waste Management Rules are applicable to the packaging solutions manufactured by us and we comply with them in alignment with our respective customers.

5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The Company's Innovation Program (NASP) promotes growth and new product development by assisting our customers in two areas:

1. New product development based on incremental ideas upgraded technology and processes, engaging with our customers frequently and using their valuable inputs
2. Based on customer feedback, our NASP Team is always developing cost-cutting solutions without jeopardizing performance.

6. Provide the following information relating to data breaches:

[UN SDG: 16.3]

a. Number of instances of data breaches along-with impact

In 2022, the number of security incidents resulting in actual data breaches confined to the India business is 1.

We have a robust data privacy policy Data privacy. We consider data privacy implications during all projects' design phases. We are committed towards demonstrating compliance with data protection principles and document all processing activities under its responsibility for the safety of all our stakeholders.

b. Percentage of data breaches involving personally identifiable information of customers

We had 1 instance of data breach involving personally identifiable consumer information. We at Huhtamaki handle customer personal data with the highest safety and security, ensuring that the data is used in a lawful, fair, and transparent way for processing and exclusively for intended legitimate purposes. Personal data retention periods are determined in the Group Record Retention Schedule and other record retention criteria used by the Group. Appropriate technological and organizational safeguards are put in place to ensure the confidentiality, integrity, and availability of personal data. These measures must cover the whole lifespan of personal data and provide a degree of security commensurate with the risks posed by the processing and type of personal data.