



April 12, 2024

Department of Corporate Services  
**BSE Limited**  
Phiroze Jeejeebhoy Towers  
Mumbai – 400001  
**Scrip Code - 509820**

The Listing Department,  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza,  
Bandra Kurla Complex  
Bandra (East),  
Mumbai 400 051  
**Symbol – HUHTAMAKI**

**Sub.: Business Responsibility and Sustainability Report for Financial Year 2023**

Dear Sir / Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), as amended from time to time, we hereby submit, the Business Responsibility and Sustainability Report for Financial Year 2023, which also forms part of the 74<sup>th</sup> Annual Report of the Company for the financial year ended December 31, 2023, as submitted to the stock exchanges earlier in the day.

We request you to kindly take the same on your record.

The Business Responsibility and Sustainability Report 2023 is also being uploaded on the Company's website at [www.flexibles.huhtamaki.in](http://www.flexibles.huhtamaki.in)

We request you to kindly note the same and acknowledge receipt.

Thanking you.

**For Huhtamaki India Limited**

Abhijaat Sinha  
Company Secretary & Legal Counsel

Encl. As above

Registered Office:  
Huhtamaki India Ltd.  
A-802, Crescenzo,  
C-38/39, G - Block  
Bandra Kurla Complex,  
Bandra (E), Mumbai-400 051  
Maharashtra.

Tel: +91 (022) 6260 6800/6260 6900  
CIN: L21011 MH1950FLC145537  
[www.flexibles.huhtamaki.in](http://www.flexibles.huhtamaki.in)

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

## SECTION A: GENERAL DISCLOSURES

This is the second edition of our BRSR disclosure, pertaining to the fiscal year 2023, in which we endeavoured to disclose 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 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	A-802, Crescenzo, C-38/39, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051
Corporate address	7 <sup>th</sup> Floor, Bellona, At the Walk - Hiranandani Estate, Ghodbunder Road, Thane (West) - 400 607
E-mail	<a href="mailto:investor.communication@huhtamaki.com">investor.communication@huhtamaki.com</a>
Telephone	+91 (022) 6174 0100
Website	<a href="http://www.flexibles.huhtamaki.in">www.flexibles.huhtamaki.in</a>
Financial year for which reporting is being done	January 1, 2023, to December 31, 2023
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 Million
Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Abhijaat Sinha +91 (022) 6174 0100 E-mail ID: <a href="mailto:abhijaat.sinha@huhtamaki.com">abhijaat.sinha@huhtamaki.com</a> Company Secretary & Legal Counsel
Reporting boundary	Disclosures made in this report are on a standalone basis and pertain to Huhtamaki India Limited. The Company does not have any subsidiary or associate companies.

### 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 (FY23)
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 a strong position as a pioneer in flexible packaging and labelling solutions in India by utilising modern technology. Under the Blueloop brand, we provide recyclable mono-material packaging solutions made of Paper, Polyethylene (PE) or Poly Propylene (PP). Whether a customer wants recyclable high-barrier applications, clever apertures, or a unique finish, we offer creative solutions for every requirement. We offer a range of package designs and formats.	98.6%

### 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	98.6%

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

Location	Number of plants	Number of offices	Total
<b>National</b>	Total 10 <ul style="list-style-type: none"> <li>• Talaja, Khopoli, Ambarnath (Three plants in Maharashtra)</li> <li>• Sri City (Andhra Pradesh)</li> <li>• Silvassa (Dadra and Nagar Haveli)</li> <li>• Guwahati (Assam)</li> <li>• Rudrapur (Uttarakhand)</li> <li>• Baddi (Himachal Pradesh)</li> <li>• Bengaluru (Two plants in Karnataka)</li> </ul>	<ul style="list-style-type: none"> <li>• Offices in Bandra-Kurla Complex (Mumbai) and Thane</li> <li>• 1 R&amp;D Centre in Khopoli (Maharashtra)</li> <li>• Delhi office</li> <li>• Kolkata office</li> </ul>	15
<b>International</b>	Zero	1 office in the 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 67 countries outside India across Europe, Africa, Oceania, Southeast Asia, Australia, North America and South America. We are one of the 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?

30.05% 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 products while maintaining high-quality standards. We offer light, innovative and increasingly sustainable flexible packaging materials, pouches and labels. We mainly serve the FMCG segment across the world. 80% of our supplies are used in food packaging and the balance in other categories, including home care, personal care, cosmetics, industrial and more.

## 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)
<b>EMPLOYEES</b>					
1. Permanent (D)	1009	888	88.0%	121	12%
2. Other than Permanent (E)	0	0	0%	0	0%
<b>3. Total employees (D + E)</b>	<b>1009</b>	<b>888</b>	<b>88.0%</b>	<b>121</b>	<b>12%</b>
<b>WORKERS</b>					
4. Permanent (F)	1454	1445	99.4%	9	0.6%
5. Other than Permanent (G)	396	396	100%	0	0%
<b>6. Total workers (F + G)</b>	<b>1850</b>	<b>1841</b>	<b>99.5%</b>	<b>9</b>	<b>0.5%</b>

### b) Differently-abled employees and workers:

S.No. Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY-ABLED EMPLOYEES/WORKERS</b>					
1. Permanent (D)		We do not have any differently-abled employees or workers currently under our employment. 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. 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 to meet the specific requirements and preferences of differently-abled employees.			
2. Other than Permanent (E)					
<b>3. Total differently-abled employees (D + E)</b>					
4. Permanent (F)					
5. Other than permanent (G)					
<b>6. Total differently-abled workers (F + G)</b>					

## 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

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

### 8. Turnover rate for permanent employees and workers:

	FY2023			FY2022			FY2021		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12.7%	27.3%	14.5%	11.8%	14.0%	12.0%	18.2%	29.0%	19.7%
Permanent Workers	8.0%	44.4%	8.3%	8.7%	8.4%	8.7%	12.9%	31.0%	13.0%

### 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 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 ₹) – ₹24,813.2 Million

(iii) Net worth (in ₹) – ₹11,504.6 Million

### 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)	FY2023		FY2022	
		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	Yes	0	0	0	0
Investors (Other than shareholders)	Our Company has a dedicated e-mail ID: <a href="mailto:investor.communication@huhtamaki.com">investor.communication@huhtamaki.com</a>	10	0	12	0
Shareholders	For redressal of investors/ shareholders grievances.	7	0	3	0
Employees and Workers	For speedy redressal of any shareholder grievances/ requests pertaining to shares, dividends, etc, the details of Registrar & Share Transfer Agents (RTA) is available on our website: <a href="https://www.huhtamaki.com/en-in/flexible-packaging/investors/investors-service-department-contact/">https://www.huhtamaki.com/en-in/flexible-packaging/investors/investors-service-department-contact/</a>	2	1	2	0
Customers (Quality complaints)		715	42	755	0
Value Chain Partners		0	0	0	0
Others (Please specify)		0	0	0	0

TSR Consultants Private Limited (TCPL), the Company's Registrar and Share Transfer Agent (RTA) has merged with Link Intime India Private Limited pursuant to Order by the National Company Law Tribunal and consequently the RTA activities of the Company is now carried out by Link Intime, effective December 22, 2023.

### 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 sustainability and the changes in regulations and feedback from stakeholders. We also update our materiality assessment on a regular basis. In 2023, we globally refreshed our double materiality assessment and the same would be published in next year's Global report. The following materiality assessment describes the risk and opportunity matrix from a more India-specific point of view, basis the assessment done in FY2023.



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, and safety during shipment, and any critical shortcoming in product safety or quality could negatively impact our 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 BRCS, provide 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, any additional expenses to replace and resolve client complaints will be borne by us.
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 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 products and keeps them safe for consumption but also helps to develop the brand image of our Company and reduce the environmental impact.
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.	Our Company's environmental strategy and activities toward energy efficiency are driving tremendous improvement in energy reduction. The objective is to ensure that everyone in the organisation understands our environmental obligations by 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 the manufacturing of packaging solutions can lower maintenance costs and requirements. It also helps in a cleaner and greener environment, thus contributing to a sustainable ecosystem.
4	Climate and emissions	Risk	Extreme environmental changes can harm any organisation due to the disruption of raw material procurement, 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 as part of our due diligence procedures and taking necessary mitigating and adapting action. Our 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 achieve carbon-neutral production by 2030.	Climate change can have both direct and indirect impacts on our Company. Direct impact may include physical damage and loss of essential resources, and indirect impact may include supply chain disruption, rising costs in different phases of production and other adverse impacts.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

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	Risk and opportunity	Most flexible packaging in India currently is intended for single-use and is discarded rather than reused or recycled. Packaging consumes numerous 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 minimising our environmental footprint across the value chain by focusing on designing for circularity and promoting sustainable end-of-use packaging.</p> <p>Our Blueloop programme was initiated to ensure 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 with 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 utilised in manufacturing activities. Recognising 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 emphasise 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 endeavour by assisting local stakeholders in undertaking water resource analysis and management.</p> <p>We have initiated our focus to achieve zero liquid discharge status at 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 Programme on Responsible Sourcing under the AIM-PROGRESS consortium. Under this, the process of verification/audit of compliance is called SEDEX (SUPPLIERS ETHICAL DATA EXCHANGE) and the Model Responsible Sourcing Audit is called SMETA (SEDEX Members Ethical Trade Audit).</p> <p>The scope of SMETA audit are (a) Business Integrity (b) Health &amp; Safety (c) Labour (d) Environment. There is a prescribed audit checklist for the audit, where 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 does not 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 for the Ambernath unit, which got commissioned very recently, all plants have gone through the requisite audit in the 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 organisation.</p>
9	Diversity and equal opportunity	Opportunity	We seek to foster an inclusive and diverse workplace. To achieve that we aim to attract, develop, and retain the finest talent in a conducive work environment by imparting appropriate training programmes, 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.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

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)
10	Employee attraction and retention	Opportunity	<p>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.</p> <p>By adhering to our principles of Care, Dare and Deliver, we all become the driving force behind putting our plan into action.</p>	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	<p>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.</p> <p>We help them by offering organised learning, on-the-job training, opportunities to learn from others and various training and development programmes.</p>	We provide continuous skill development and learning opportunities through organised training programmes, career conversations, and individual development programmes 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	Labour retention	Opportunity	We believe that labour relations are essential in manufacturing focused business. We have followed principles set out by the International Labour Organisation.	Good labour relations translate in overall productivity and leads to higher work satisfaction levels.	Our various projects focus on improving efficiency of manufacturing network, labour productivity and reduce wastages from operations to boost the long-term competitiveness of our Company.
13	Occupational health and safety	Risk	It is vital to provide a safe working environment in order to minimise absenteeism and boost employee morale. Risks related to incidents that potentially compromise health and safety can impose various threats to human lives associated with our Company.	<p>Huhtamaki places a high priority on Occupational Health and Safety (OHS).</p> <p>We are developing a safe work culture to integrate safety across the Company. Our 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 our Company.</p>	Working days are lost owing to work-related illness and injury, which impedes our product production and supply.
14	Supply chain and responsible sourcing	Risk	The supply chain is extremely important in the packaging sector, and any interruption in this may expose our 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.	Our 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 unfavourable 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 labour.





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)
15	Customer satisfaction	Opportunity	We customise 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	Anti-corruption and ethics	Opportunity	The Huhtamaki Ethics and Compliance programme focuses on Huhtamaki's commitment to ethics and legal compliance. The programme 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 behaviour, 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
<b>Policy and management processes</b>									
1. a) <b>Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b> [UN SDG: 16.6]	Y	Y	Y	Y	Y	Y	N	Y	Partially
b) <b>Has the policy been approved by the Board? (Yes/No)</b> [UN SDG: 16.6]	The Board has approved and signed all mandatory policies required by Indian laws and regulations. Other operational internal policies are authorised and signed by the management and the Managing Director/Director.								
c) <b>Web-link of the Policies, if available</b> [UN SDG: 16.6]	The web-link for the policies is <a href="https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/">https://www.huhtamaki.com/en-in/flexible-packaging/investors/corporate-governance-and-policies/policies/</a>								
2. <b>Whether the entity has translated the policy into procedures. (Yes/No)</b> [UN SDG: 5.5, 16.7]	Y	Y	Y	Y	Y	Y	N	Y	Partially
3. <b>Do the enlisted policies extend to your value chain partners? (Yes/No)</b> [UN SDG: 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.								

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

<b>4. Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fair trade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle.</b>																																																																																																		
Principle 1	We have the below mentioned national and international codes/certifications/labels/ standards:																																																																																																	
Principle 2																																																																																																		
Principle 3	1. Principle 1 and 5: SMETA																																																																																																	
Principle 4	2. Principle 3: ISO 45001																																																																																																	
Principle 5	3. Principle 6: Forest Stewardship Council, ISO 14001																																																																																																	
Principle 6	In 2023, we also initiated the ISCC+ certification process for our Khopoli factory																																																																																																	
Principle 7	4. Principle 9: ISO 9001, ISO 22000, BRCGS Packaging, US FDA, HALAL																																																																																																	
Principle 8	We have not mapped our operations to any other codes/certifications/labels/standards than the ones mentioned above.																																																																																																	
Principle 9																																																																																																		
<b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</b> <i>[UN SDG: 5.5, 12.2, 12.4, 12.5]</i>	Huhtamaki India has identified targets with respect to renewable electricity and carbon neutrality, water, waste, product recyclability, material use in terms of product, etc. In 2023, internal targets to reduce solvent usage intensity were also developed.																																																																																																	
<b>6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.</b>	We intend to reach carbon neutral production by 2030, our absolute Scope 1+Scope 2 emissions in 2023 were 54,507 tonnes which was a 20% absolute reduction vs. 2022. We are recycling 98.6% of our non-hazardous waste against our target of 90%. 10% of our material usage is from renewable or recycled sources. Our Health & Safety Lost Time Frequency Rate for 2023 was 1.24.																																																																																																	
<b>Governance, leadership, and oversight</b>																																																																																																		
<b>7. Managing Director's statement</b> A detailed summary of our Managing Director's statement on sustainability goals, commitments and our contribution till now is available in our Annual Integrated Report for the FY2023. <i>[UN SDG: 5.5, 16.7]</i>																																																																																																		
<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies.</b> <i>[UN SDG: 12.2]</i>	Managing Director of Huhtamaki India Limited																																																																																																	
<b>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.</b> <i>[UN SDG: 12.2]</i>	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.																																																																																																	
<b>10. Details of Review of NGRBCs by the Company:</b>																																																																																																		
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<b>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.</b>	<table border="1"> <thead> <tr> <th>P</th><th>P</th><th>P</th><th>P</th><th>P</th><th>P</th><th>P</th><th>P</th><th>P</th><th>P</th> </tr> <tr> <th>1</th><th>2</th><th>3</th><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>9</th><th></th> </tr> </thead> <tbody> <tr> <td colspan="10">The accreditation process includes ongoing periodic assessments as well as internal and external audits of the Quality, Safety &amp; Health, Human Rights 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.</td> </tr> </tbody> </table>	P	P	P	P	P	P	P	P	P	P	1	2	3	4	5	6	7	8	9		The accreditation process includes ongoing periodic assessments as well as internal and external audits of the Quality, Safety & Health, Human Rights 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.																																																																												
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**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 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 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. To secure sensitive customer information, we have data privacy and cybersecurity system in place. 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 programmes focuses on Huhtamaki's commitment to ethics and legal compliance. The programme 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 programmes on any of the principles during the fiscal year: [UN SDG: 16.3, 16.7]**

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% Age of persons in respective category covered by the awareness programmes
Board of Directors	As part of the Familiarisation Programme, the Independent Directors travel to a plant to experience operations first-hand and interact with employees on the ground for a better understanding of the manufacturing process, efficiencies, opportunities and challenges, innovation pipeline, sustainability initiatives, etc.		100%
Key Managerial Personnel	During the year, the Independent Directors along with the Executive Directors visited the Company's Silvassa Plant and familiarised themselves with the nuances on Safety, Products, Manufacturing Process, Productivity, TPM, Capacity Utilisation, Blueloop investments, etc. The Factory Manager along with his leadership team gave a brief overview of the plant and its achievements, pursuits, challenges, innovations and milestones in their interaction with the Independent Directors. The Independent Directors interacted formally and informally with employees to get first-hand information about the initiatives on the ground, challenges, strengths, capabilities, and areas of improvement.	At the meetings of the Board of Directors and Committees thereof, the members discuss the following topics viz. business performance, operating plans, budgets, operational performance and measures, sales forecast and targets, customers and their expectations, technological innovation, research and development and opportunities etc. The Committees deliberate in detail the Company's Risk Management Strategy & Mitigation Plans, Related Party Transactions, Internal Finance Controls, Corporate Social Responsibility, cybersecurity, etc. at regular intervals.	
	<b>Total interactions by MD (Managing Director) and CFO are:</b>		
	Board: 6 times		
	Audit Committee: 7 times		
	NRC: 3 times		
	Risk Management Committee, CSR Committee and the Stakeholders Relationship Committee: 2 times each		
	Training sessions on Company's Code of Conduct and Anti-Bribery and Anti-Corruption Policy, Cyber Security, Prevention of Sexual Harassment at Workplaces, Prevention of Insider Trading, Enterprise Risk Management		

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% Age of persons in respective category covered by the awareness programmes
Employees other than BoD and KMPs	1161	The training modules have been designed with the core values of Care, Dare and Deliver at the forefront. The training modules have been designed with the core values of Care, Dare and Deliver at the forefront.	100%
Workers	1639	<p><b>Human rights</b> training encompasses topics such as the Code of Conduct and Prevention of Sexual Harassment.</p> <p><b>Professional and digital skills training</b> includes major courses such as Microsoft Excel, Microsoft Power Point, Critical Thinking and Business Communication.</p> <p><b>Leadership development training programmes</b> include sessions on Leader's Imprint, Feedback, and Development Conversations.</p> <p><b>Employee wellness</b> comprises of monthly courses on themes such as nutrition, stress management, yoga, fitness conditioning, building resilience, establishing workplace connections, and the Balance Act.</p> <p><b>Occupational health and safety training</b> includes fire safety, first aid, chemical and machinery handling, on-site emergency response, and women's safety as the major topics.</p> <p><b>Specific trainings on sustainability, legal &amp; compliance, quality, maintenance, supply chain</b> were conducted throughout the year.</p>	100%

**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 ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	There were no material 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.	NA



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

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 programme 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 organisation 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]

	FY2023	FY2022
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 instils 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]

	FY2023		FY2022	
	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 and 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]

As there were no instances of corruption or conflicts of interest as above, no corrective action was taken on matters pertaining to fines/penalty/activity taken by regulators/law enforcement agencies/judicial institutions, and we hope to retain this stance by raising awareness of the conditions in which conflicts might develop, by strengthening capabilities to avoid conflict of interest through training, and ensuring effective processes to handle such situations.

## Leadership indicators

### 1. Awareness programmes 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. Our 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 fulfils 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 authorised 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.

Web-link: <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 organisation 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.

	FY2023	FY2022	Details of improvements in environmental and social impacts
R&D	₹15.0 Million	(Total) 12.1 Million ₹/Specific techs amount required	The investments help in the manufacturing of mono-material laminates which are recyclable in the Indian ecosystem, thus enabling circularity in flexible packaging.
Capex	0.0	(Total) 19.6 Million/ Specific techs amount required	Note: While we invested in manufacturing capabilities for sustainable packaging solutions in 2023, the investments are under installation and will be capitalised in 2024. Hence, the amount shows a nil figure for the year.

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

[UN SDG: 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 utilising new supplier screening tools and processes as well as aligning with third-party verifications and standards. As a responsible Company, we aim 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 evaluated to determine the likelihood of corruption and legal compliance. Potential high-risk suppliers are evaluated 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:**

[UN SDG: 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 EPR targets, we are collecting post-consumer used plastics and recycling or implementing end of life treatment as 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, EPR 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?**

[UN SDG: 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 these capabilities in India in the upcoming years. Our global headquarters has started the LCA process, and over the next few years, we look 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.**

[UN SDG: 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).**

[UN SDG: 8.4, 12.2, 12.5]

Huhtamaki is working to develop the value chain for incorporating recycled content into its packaging solutions. Packaging solutions with inclusion of recycled content is a key focus area for Huhtamaki India and capabilities towards the same are being implemented.

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

[UN SDG: 8.4, 12.2, 12.5]

	FY2023			FY2022		
	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				NA		
Hazardous waste				NA		
Other waste				NA		



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

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

[UN SDG: 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 organisation's most valuable asset since they not only serve as a link with the customers but also greatly contribute to the organisation's success. Employees feedback is acknowledged in our organisation, 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 organisation and allows 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	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	888	888	100%	888	100%	0	0%	888	100%	0	0%
Female	121	121	100%	121	100%	121	100%	0	0%	0	0%
<b>Total</b>	<b>1009</b>	<b>1009</b>	<b>100%</b>	<b>1009</b>	<b>100%</b>	<b>121</b>	<b>100%</b>	<b>888</b>	<b>100%</b>	<b>0</b>	<b>0%</b>

##### b) Details of measures for the well-being of workers:

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male	1445	1445	100%	1445	100%	0	-	0	0	0	0
Female	9	9	-	9	-	9	-	0	0	0	0
<b>Other than permanent workers</b>											
Male	396	396	100%	396	100%	9	0%	0	0%	0	0%
Female	We currently have not employed any female contractual workers										
<b>Total</b>	<b>1850</b>	<b>1850</b>	<b>100%</b>	<b>1850</b>	<b>100%</b>	<b>9</b>	<b>-</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

##### 2. Details of retirement benefits:

Benefits	FY2023			FY2022		
	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/ NA)	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/ NA)
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. Our new corporate office in Thane, Mumbai are built for access support for people with disabilities. The office is also equipped with accessible washrooms.

### 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 our India operations. All employees' distinct characteristics and opinions are valued. Everyone is treated and given equal opportunities for employment regardless of race, colour, 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 rate
Male	100%	100%	100%	100%
Female	100%	100%	100%	100%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

### 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]

	(If yes, then give details of the mechanism in brief)
Permanent Workers	Yes, we have a procedure in place for handling employee and worker issues. We have established an internal committee where women may report violations of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the "Act") and its Rules. The committee makes sure that there are fewer violations and a safer workplace. Employees can report any action they believe to be illegal, dishonest, unethical, or otherwise improper under our whistleblower policy.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

[UN SDG: 8.8]

Category	FY2023			FY2022		
	Total employees/ workers in respective category	No. of employees/ workers in respective category, who are part of association(s) or Union	% (B/A)	Total employees/ workers in respective category	No. of employees/ workers in respective category, who are part of association(s) or Union	% (D/C)
	(A)	(B)		(C)	(D)	
<b>Total Permanent Employees</b>	<b>1009</b>	<b>0</b>	<b>0%</b>	<b>1223</b>	<b>0</b>	<b>0%</b>
Male	888	0	0%	1066	0	0%
Female	121	0	0%	157	0	0%
<b>Total Permanent Workers</b>	<b>1454</b>	<b>440</b>	<b>30%</b>	<b>1683</b>	<b>547</b>	<b>32.5%</b>
Male	1445	440	30%	1671	547	32.7%
Female	9	0	0%	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	FY2023					FY2022				
	Total	On Health and safety measures		On Skill upgradation		Total	On Health and safety measures		On Skill upgradation	
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	(D)	No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Permanent employees and workers</b>										
Male	2333	1887	80.9%	2111	90.5%	2756	1822	66.1%	1882	68.3%
Female	130	78	60.0%	120	92.3%	171	55	32.2%	115	67.3%
<b>Total</b>	<b>2463</b>	<b>1965</b>	<b>79.8%</b>	<b>2231</b>	<b>90.6%</b>	<b>2927</b>	<b>1877</b>	<b>64.1%</b>	<b>1997</b>	<b>68.2%</b>
<b>Contractual employees and workers</b>										
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										
<b>Total</b>										

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

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

Category	FY2023			FY2022		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	888	888	100%	1066	1066	100%
Female	121	121	100%	157	157	100%
<b>Total</b>	<b>1009</b>	<b>1009</b>	<b>100%</b>	<b>1223</b>	<b>1223</b>	<b>100%</b>
<b>Workers</b>						
Male	1445	1445	100%	1671	1671	100%
Female	9	9	100%	12	12	100%
<b>Total</b>	<b>1454</b>	<b>1454</b>	<b>100%</b>	<b>1683</b>	<b>1683</b>	<b>100%</b>

**10. Health and safety management system:**

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

**a) 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.

**b) 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 programmes 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.

**c) 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 formalised 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.

**d) Do the employees/workers of the entity have access to non-occupational medical and healthcare services?**

Yes, our Company conducts periodic health checkups for all its employees and even for the new employees. We provide health insurance for all our 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	FY2023	FY2022
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.2	0.0
	Workers	1.3	1.0
Total recordable work-related injuries	Employees	13	0
	Workers	10	16
No. of fatalities	Employees	0	0
	Workers	0	1 (contractual worker – not on the Company's payroll)
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 business has a thorough health and safety policy that is implemented at all organisational levels. Our Company is dedicated to implementing and minimising 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 programme. 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 programmes.

**13. Number of complaints on the following made by employees and workers:****[UN SDG: 16.6]**

	FY2023			FY2022		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed 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 and safety						

**14. Assessments for the year:**

	% of plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	90% of the plants
Working conditions	90% of the plants

Nine of our factories are certified for ISO 45001 and are audited as per their requirements by third party agencies. We work on an annual auditing principle. 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 analysed. 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 programme that covered work at height at each site was spurred by Huhtamaki'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	
	FY2023	FY2022	FY2023	FY2022
Employees	0	0	0	0
Workers	0	1 (contractual worker)	0	0

**4. Does the entity provide transition assistance programmes 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]

We undertake case specific-assistance programmes for the management of career endings occurred through either termination or retirement.

**5. Details on assessment of value chain partners:**

[UN SDG: 5.2, 8.8, 16.1]

A key element of Huhtamaki’s due diligence processes is the use of 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 above-mentioned lists, RiskRate will automatically alert us with more case details.

**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]

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.

**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 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 operations.

## Essential indicators

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

[UN SDG: 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:

[UN SDG: 16.7]

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (E-mail, 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	E-mail, website, postal communication, panel meetings, conferences, facility visits, industry associations.	Periodically or event-based	Advocacy, Compliance assurance, thought leadership, preparing representation on policy matters as may be needed
NGOs	No	E-mails, community meetings	Periodically as required	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	Performance and talent management, build a safe and inclusive working culture, communicate vision and strategy of the Company, seek feedback
Employees	No	E-mails, notice boards, meetings, town-halls, internal websites, digital tools, Employee engagement surveys, Appraisals, Reward & recognition programmes, grievance mechanism	Weekly, monthly, quarterly, half yearly, annually	Performance and talent management, build a safe and inclusive working culture, communicate vision and strategy of our Company, seek feedback
Customers	No	E-mails, official meetings, website	Periodically, Event Based	To understand customer needs, ensure prompt service to the customers, seeking feedback, addressing concerns or grievances if any
Suppliers	No	E-mails, official meetings, website, digital applications, supplier checks, supplier visits	Periodically, Event Based	Ensure business continuity, ensure material quality, confirmation on supplier code of conduct
Local community	Yes	Through CSR initiatives	Periodically	To understand the needs of the local community, support the communities on social needs
Investors	No	Website, financial reports, investor calls, Stock Exchange, newspaper publication, and grievance redressal mechanisms	Quarterly, half yearly, annually, event based	Communicate financial results/ material occurrences
Shareholders	No	Shareholder meetings, quarterly calls, website, financial reports, investor calls, Stock Exchange, newspaper publication, and grievance redressal mechanisms	Quarterly, half yearly, annually, event based	Communicate financial results/ material occurrences, as well as a grievance redressal process

## Leadership indicators

### 3. 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:

[UN SDG: 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. Our Company aims to improve the rigour and focus on ESG-related matters in the coming years.

### 4. 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.

### 5. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/marginalised stakeholder groups.

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

[UN SDG: 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	FY2023			FY2022		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1009	959	95%	1223	1064	87%
Other than permanent	-	-	-	-	-	-
<b>Total employees</b>	<b>1009</b>	<b>959</b>	<b>95%</b>	<b>1223</b>	<b>1064</b>	<b>87%</b>
<b>Workers</b>						
Permanent	1454	1323	91%	1683	1495	89%
Other than permanent	396	0	-	555	0	-
<b>Total workers</b>	<b>1850</b>	<b>1323</b>	<b>78%</b>	<b>2238</b>	<b>1495</b>	<b>67%</b>

**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	FY2023					FY2022				
	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)
<b>Employees</b>										
Permanent	1890	-	-	1890	100%	1223	-	-	1223	100%
Total employees	1890	-	-	1890	100%	1223	-	-	1223	100%
<b>Workers</b>										
Permanent	440	-	-	440	100%	1683	-	-	1683	100%
Total workers	440	-	-	440	100%	1683	-	-	1683	100%

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

[UN SDG: 16.7]

Particulars	(Amount in ₹)			
	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	2	44,25,000	1	43,50,000
Key Managerial Personnel	3	162,91,272	0	0
Employees other than BoD and KMP	1890	5,76,528	130	8,39,712
Workers	440	5,22,516	0	0

**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 the United Nations International Bill of Human Rights as well as the UN Guiding Principles on Business and Human Rights.

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

[UN SDG: 16.6]

We have internal guidelines to address grievances related to human rights. Our Code of Ethics and Behaviour Policy defines the set of behaviours and actions that our employees and other stakeholders should abide by so as to ensure compliance with regulatory requirements, ethical standards as well as avoid any human rights violations. Policy On Prevention, Prohibition And Redressal Of Sexual Harassment Of Women At Workplace has been instated to strictly monitor and address any concerns regarding sexual harassment of women.

**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]

	FY2023			FY2022		
	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	2	1*		1	0	Apart from 1 case of sexual harassment filed, there were no other cases pertaining to discrimination, child labour, forced labour, involuntary labour, wages or other human rights issues
Discrimination at workplace	0	0		0	0	
Child labour	0	0		0	0	
Forced Labour/Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

\* The investigation has been completed but there is a delay in closure due to requirement for additional statements and documents from both parties. The recommendations are expected to be issued by April 15, 2024.

There were two cases of sexual harassment that was filed during the year which were addressed by the internal complaints committee. One of the cases was successfully resolved while one is pending for resolution. We are working on strengthening the mechanisms and policies to prevent such incidents in the future.

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

[UN SDG: 16.6]

Any form of workplace violence is prohibited at Huhtamaki. The use of threats or intimidation is also prohibited. No employee may use or carry firearms or other weapons while on Huhtamaki property or while conducting business on Huhtamaki’s behalf in order to help promote a safe work environment for all employees. Huhtamaki does not tolerate any form of harassment, including sexual, racial, or any other hostile, inconsiderate, abusive, or undignified behaviour.

In compliance with the terms of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the “Act”) and Rules made thereunder, we have adopted an anti-sexual harassment policy, which is gender agnostic, and the Company has established an internal complaints committee. Our Company runs awareness campaigns in each of its divisions to teach staff members how to treat their coworkers with dignity.

To report actual or suspected frauds and violations of the Code of Conduct and/or Ethics Policy, a whistleblower may do so through a variety of ways. The Whistleblower Policy lays down a thorough procedure for reporting, processing, and investigating fraudulent activity and provides the necessary protection to employees who disclose such fraudulent operations or unethical behaviour. No employee has been prevented from bringing their concerns before the Audit Committee. Any alleged violation may be reported by an employee, amongst others, to the India Investigation Lead by e-mailing [IndiaInvestigationLead@huhtamaki.com](mailto:IndiaInvestigationLead@huhtamaki.com). A letter marked “Confidential” may also be sent by an employee to the India Investigation Lead at the Company’s registered office.

To highlight the value of ethics and compliance in the workplace, Huhtamaki India has launched an awareness campaign dubbed #DoRight – The Huhtamaki Way! The campaign’s aim is to inform and instruct employees on the business’ whistleblower policy, how to use the Speak Up platform more efficiently, and, most importantly, how to #DoRight – The Huhtamaki Way! The campaign’s mascot, CoCo, delivers a series of messages during the campaign.

Our Code of Conduct which is applicable to every employee mandates that complete protection be given to a Whistle-Blower against any unfair practice like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like including any direct or indirect use of authority to obstruct the whistleblower’s right to continue to perform their duties/ functions including making further Protected Disclosure. The policy also clearly states that retaliation against an employee reporting any form of harassment is strictly prohibited.

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]

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	All our factories get audited as per SMETA audit protocols, which focus on areas such as forced labour, human rights, wages, discrimination etc. 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.
Forced/involuntary labour	
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.**

No significant risk or concern was identified in the audits.





## 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

Not applicable. However, we adhere to the highest level of Human Rights standards at work.

### 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?

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. Our administrative office building in Mumbai is being built for access support for people with disabilities. The office is also equipped with accessible washrooms.

### 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 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 above-mentioned lists, RiskRate will automatically alert us with more case details.
Discrimination at workplace	
Child labour	
Forced/involuntary labour	
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 evaluated to assess that help assess the risk of corruption and compliance with law. Possible high-risk suppliers are evaluated 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 have been no significant risks or concerns as mentioned earlier. Where there were concerns, appropriate preventive and corrective actions were taken.

## 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 of 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 organisation 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:

[UN SDG: 7.2, 7.3, 8.4, 12.2, 13.1]

Parameter	FY2023	FY2022
Total electricity consumption (A) in MJ	245,898,685.2	272,559,704.4
Total fuel consumption (B) in MJ	183,288,878.1	213,645,216.4
Energy consumption through other sources (C) in MJ	0	0
<b>Total energy consumption (A+B+C) (in MJ)</b>	<b>429,187,563.3</b>	<b>486,204,920.8</b>
Energy intensity per rupee of turnover (MJ/ ₹Millions)	16,733	16,205

**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.

[UN SDG: 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:

[UN SDG: 6.3, 6.4, 12.4]

Parameter	FY2023	FY2022
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	30	787
(ii) Groundwater	79,375	64,021
(iii) Third party water (Municipal water supplies)	66,585	102,338
(iv) Seawater/desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in KL) (i + ii + iii + iv + v)</b>	<b>145,990</b>	<b>167,146</b>
<b>Total volume of water consumption (in KL)</b>	<b>145,990</b>	<b>167,146</b>
<b>Water intensity per rupee of turnover (KL/ ₹Millions)</b>	<b>5.7</b>	<b>5.6</b>

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

[UN SDG: 6.3, 6.4, 6.A, 12.4]

Yes, we work towards Zero Liquid Discharge mechanisms at relevant sites, and 4 of our factories already operate at that level. To maximise 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:

[UN SDG: 3.9, 12.4, 14.3, 15.2]

Parameter	Please specify unit	FY2023	FY2022
NOx	KG	1,007.2	1,173.4
SOx	KG	704.6	821.4
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – Ozone Depleting Substances (HCFC – 22 or R-22)			

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.



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

[UN SDG: 3.9, 12.4, 13.1, 14.3, 15.2]

Parameter	Unit	FY2023	FY2022
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MT CO <sub>2</sub> e	10,674	14,251
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MT CO <sub>2</sub> e	43,833	53,920
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>	(Tonnes/₹Millions)	<b>2.1</b>	<b>2.3</b>

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

[UN SDG: 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, Sri City's factory uses biofuel. Implementing rooftop solar three facilities, securing independent feeder at Rudrapur factory and reducing electricity consumption across all sites.

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

[UN SDG: 3.9, 6.6, 8.4, 11.2, 11.6, 12.4, 15.1]

Parameter	FY2023	FY2022
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	8,129	9,857
E-waste (B)	2.8	4.1
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	NA	NA
Battery waste (E)	0.4	6.9
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (Chemical, chemical storage drums) (G)	1,075.8	1,276.0
Other Non-hazardous waste generated (H). (majorly includes Paper waste, stationary waste, organic waste)	5,832	8,081
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>15,040</b>	<b>19,926</b>
<b>Total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	14,769	19,590
(ii) Re-used	0	0.14
(iii) Other recovery operations	0	27.86
<b>Total</b>	<b>14,769</b>	<b>19,118</b>
<b>Total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	256	89
(ii) Landfilling	15	19
(iii) Other disposal operations	0	0
<b>Total</b>	<b>271</b>	<b>108</b>

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:

[UN SDG: 3.9, 6.3, 6.6, 8.4, 11.6, 12.4]

We closely monitor the waste generated in each of our units. We have a strong programme in place 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 analysed monthly. Specific targets for waste reduction are taken at each unit and the action plan is tracked through the year.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

Our Company has declared 2030 ambitions on recycling of hazardous waste and reduction in landfilling and we are maintaining a robust performance on these targets. For hazardous waste, material consumption optimisation 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:

[UN SDG: 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:

[UN SDG: 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
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 non-compliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken if any
Yes, we abide by all applicable environmental laws, rules, and directives in India. To verify our adherence to the law, we use an internal tool 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:

[UN SDG: 7.2, 7.3, 8.4, 12.2, 13.1]

Parameter	FY2023	FY2022
<b>From renewable sources:</b>		
Total energy consumed from renewable sources (A+B+C) in MJ	24,569,995.6	26,557,752.0
<b>From non-renewable sources</b>		
Total energy consumed from non-renewable sources (D+E+F) in MJ	404,617,568.7	459,631,933.0

### 2. Provide the following details related to water discharged:

[UN SDG: 6.3]

Parameter	FY2023	FY2022
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To surface water	10,772	2,845
- No treatment	0	0
- With treatment – please specify level of treatment	10,772	2,845
(ii) To Groundwater	42,150	38,021
- No treatment	0	0
- With treatment – please specify level of treatment	42,150	38,021
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties	0	0
- No treatment	0	0
- 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
<b>Total water discharged (in kilolitres)</b>	<b>52,922</b>	<b>40,866</b>

**3. Water withdrawal, consumption, and discharge in areas of water stress (in kilolitres):****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:****[UN SDG: 6.3]**

Parameter	FY2023	FY2022		
<b>Water withdrawal by source (in kilolitres)</b>				
(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				
<b>Total volume of water withdrawal (in kilolitres)</b>				
<b>Total volume of water consumption (in kilolitres)</b>				
<b>Water intensity per rupee of turnover</b> ( <i>Water consumed/turnover</i> )				
<b>Water intensity</b> ( <i>optional</i> ) – the relevant metric may be selected by the entity				
<b>Water discharge by destination and level of treatment (in kilolitres)</b>				
(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				
<b>Total water discharged (in kilolitres)</b>				

**4. Please provide details of total Scope 3 emissions & its intensity, in the following format:****[UN SDG: 3.9, 12.4, 13.1, 14.3, 15.2]**

Huhtamaki India measures the Scope 1 and 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 and 2, while also identifying the various avenues of Scope 3 emissions that will help us measure 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.****[UN SDG: 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. None the less, we have planned to undertake Biodiversity Risk Assessment based on the TNFD guidelines in the next two years.

**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:****[UN SDG: 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 hand, we are working to switch to renewable energy, on the other hand, we are taking actions to optimise and reduce our energy consumption, thus mitigating GHG emissions at source. When it comes to energy conservation, even small initiatives

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

taken across the operations bring in a lot of benefits. All our manufacturing units are undertaking various projects for both fuel and electricity consumption reduction. A few examples include electricity consumption mapping, benchmarking and reduction at Sri City factory; independent power feeder at Rudrapur factory, and air compressor optimisation and demand load optimisation at various factories.

**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 organisation 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 Company’s mission, mobilise our people, and get favourable 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 Pact, The Council of EU Chambers of Commerce in India, and 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	Confederation of India Industries (CII)	National
6	India Plastic Pact	National
7	The Council of EU Chambers of Commerce in India	International
8	Resource Efficiency Circular Economy Industrial Coalition (RECEIC) – Founding member	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 our Company's Ethics and Compliance programme'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 globalisation and technical progress have resulted in rapid economic development, but the advantages have been disproportionately distributed. Huhtamaki 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:

[UN SDG: 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
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:

[UN SDG: 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 ₹)
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 that are responsible for monitoring and reviewing the mitigation of any such concerns.

[UN SDG: 1.4, 2.3, 9.1, 9.4, 16.6]

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

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

[UN SDG: 8.3]

	FY2023	FY2022
Directly sourced from MSMEs/small producers	3.4%	3.0%
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):

[UN SDG: 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:

[UN SDG: 1.4, 2.3]

S. No.	State	Aspirational District	Amount spent (in ₹)
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 marginalised/vulnerable groups? (Yes/No)

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

#### (b) From which marginalised/vulnerable groups do you procure?

Currently, we are not procuring our raw materials from people belonging to marginalised/vulnerable groups as defined by NGBRC.

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

[UN SDG: 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:

[UN SDG: 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:

[UN SDG: 1.4, 2.3]

S. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1.	Cylinders Taloja Plant donated first aid kits, stationery kits and sports uniform to neighbouring government school for raising awareness on safety and helping in school upgrade.	180	90%
2.	Provided power backup facility through inverter installation, LED tube lights and stationery kits for 155 students in a government school at Rudrapur.	235	100%
3.	Installed water filter in a government school and distributed stationery kits to 400 students in a neighbouring government school at Baddi. Donated 13 solar lights to the society.	400	100%
4.	Khopoli plant has organised various activities under social initiatives like tree plantation at Ashram Shala, distribution of stationery kits, first aid kits. Society upgrade through solar light implementation and providing water filters to the government school.	982	100%
5.	Distribution of school benches and teacher tables to a neighbouring government school done at Ambernath, Maharashtra.	44	100%
6.	Distribution of stationery materials and arranged safety awareness session at Sri City. Additionally, tree plantation was done in two schools	670	100%
7.	Donated water filters and school bags among the students of a government school at Bengaluru.	600	100%
8.	Distribution of almirah cabinets to old age homes for the purpose of keeping their personal belongings at Rudrapur, Uttarakhand. Also donated shoes, first aid kit, water dispenser, water bottle – SS, lunchbox and conducted an awareness session for students health and safety.	NA	NA
9.	The Corporate team donated 2 television sets and 2 washing machines to an old age home. Also, donated water filters and stationery kits to the PMC School in Thane.	1,050	100%
10.	In 2022, Huhtamaki India had set up a recycling plant in Khopoli, Maharashtra with the aim to recycle post-consumer use Multi-layered Plastic (MLP) packaging waste. Post-consumer MLP waste collected from the city of Pune is cleaned, segregated and recycled 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 because of lack of financial feasibility of MLP recycling. This one-of-its-kind initiative has been implemented to start a transparent and ethical recycling setup enabling circularity for Multi layered plastics. In 2023, Huhtamaki continued operations of this MLP recycling plant through CSR funding.	NA	NA

### 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 bring the best to our customers as we demonstrate that 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.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

- 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.
- 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 the real issue. Based on the initial interaction, the QC head accepts or rejects the complaint. If accepted, the response to customer, through the sales representative, is communicated 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:

	FY2023		Remarks	FY2022		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 in 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, digitalisation, and personalisation. We stand at 100% digitisation of all customer transactions worldwide, which drives us to strengthen our robust framework of consumer data protection and cybersecurity on a regular basis.			
Advertising						
Cybersecurity						
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 customised 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 cybersecurity 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 cybersecurity position is paramount for customers today. Our strong policies on data privacy and cybersecurity 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; cybersecurity 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, e-mailers 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]**

Our Company follows all applicable product labelling requirements and displays pertinent information as required by law and per the customer's specifications/instructions. We manufacture/supply packaging materials that are customised as per customer requirements; hence product information rules do not apply to Huhtamaki. However, the marking and labelling 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 Programme (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 jeopardising 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 2023, the number of security incidents resulting in actual data breaches confined to the India business is 1.

We have a robust data privacy policy. 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 customer 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 organisational 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.