

Mondi's Code of Conduct for Suppliers

Introduction

Mondi is aware of its corporate responsibility towards people, communities, and the environment. We support the global sustainable development agenda. Our corporate conduct and sustainable development performance is governed by our Business Integrity Policy, our Code of Business Ethics, and our Sustainable Development Policies.

Responsible sourcing is a powerful tool for driving sustainable values and practices throughout the value chain. We aim to build proactive working relationships and long-term partnerships with our suppliers and promote responsible conduct along our supply chain, creating long-term value for both Mondri and its stakeholders. Sustainability is an integral principle of supplier management at Mondri, and we see our suppliers as critical to our success.

Definition

Suppliers are defined as companies or persons manufacturing goods, trading with goods or rendering services, including suppliers of all materials and services, contractors, consultants, outsourcing services, distributors, and other business partners.

Scope

All Mondri Group companies and business units worldwide, including joint ventures where we have a controlling interest are required to apply this Code to their suppliers of all goods and services irrespective of the jurisdiction in which they operate and the laws applicable to such jurisdiction (where this Code represents a higher standard). Where we have a non-controlling interest, we encourage the application of this policy with our business partners.

We expect our suppliers to apply similar requirements for their own supply chain.

Policy

Our Code of Conduct for Suppliers (the 'Code') sets out minimum standards and expectations for environmental, social, and ethical performance for all our suppliers. It refers to international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO)'s Core Conventions, United Nations Environment Programme (UNEP) and the 10 Principles of the United Nations Global Compact. This Code should be implemented in conjunction with our Business Integrity Policy, our Code of Business Ethics, and our Sustainable Development policies.

The Code states clearly the key principles and values that direct our conduct and it encourages all those with whom we do business to observe the same. Mondri expects its suppliers to comply with all relevant local, national, and regional laws and international treaties, to treat their employees fairly with dignity and respect, to provide a safe and healthy work environment, to act in an environmentally responsible manner and to conduct business with honesty and integrity.

This Code refers to following key focus areas for suppliers:

1. Legal Compliance
2. Product Safety, Environment and Climate
3. Safety and Occupational Health
4. Labour and Human Rights
5. Business Ethics

Each of these key focus areas is explained in more detail in the appendices to this Code.

Compliance

We seek to do business with suppliers and other business partners who share our values and high standards of sustainable and ethical business behaviour.

The expectations contained in this Code will influence our decision whether to enter into or extend existing business relationships. If a supplier is not able to meet our minimum requirements, we reserve the right to suspend sourcing from the supplier until we are satisfied with their performance. Suppliers who deviate persistently or in a significant way from these requirements will be excluded from business with Mondi.

Monitoring and review

Mondi has a supplier relationship management system in place to ensure there is a consistent process for the selection, evaluation, monitoring and management of Mondi's suppliers, including off-boarding through end of contractual relationship. This system uses a risk-based approach to assess suppliers against the requirements of this Code and is based on the country from and the industry in which the product or service is provided.

Using a risk-based approach, we will evaluate new suppliers before Mondi enters into a business relationship with them. Additionally, a selected number of existing suppliers will be periodically assessed and reviewed. These suppliers will be selected based on Mondi's own internal measurement of potential risk in any of the five areas of this Code.

Such an evaluation will initially take the form of a self-assessment (questionnaire). If the self-assessment of a supplier raises any concerns or issues, which require clarification, Mondi will request and collect further information from the supplier. Appropriate to the scale and nature of concerns raised, this may take the form of requesting further information, a telephone conference or presential meeting. In addition, Mondi reserves the right to undertake an on-site audit of the supplier where required. Should any non-compliances be confirmed during such audit, corrective actions can be requested by Mondi to ensure that compliance is reached.

Should Mondi become aware of any instances of non-compliance through any other means, we reserve the right to investigate and take action related to the specific case as appropriate. This does, however, not limit or exclude any of our statutory or contractual rights or remedies in any way.

Sanctions

Should any instances of non-compliances be identified, we may require appropriate action on a case-by-case basis. For instance, any violation of human rights-related or environmental obligations may require appropriate remedial action to prevent, end or minimize the extent of the violation. Failure to take effective corrective or remedial action may result in suspension or termination of the supplier contract/business relationship.

Responsibility of Supplier

Suppliers shall be aware of, and monitor, all sites and companies involved in their production and supply network, and should, upon request, provide Mondi with adequate details of the supply chain for the goods and/or services supplied to Mondi (e.g. country of production, ship from location). Suppliers are responsible for ensuring that their employees, representatives, contractors, and subcontractors understand and comply with the requirements of this Code.

Suppliers must be able to provide relevant information, in a timely manner, to demonstrate compliance with this Code upon request, and should immediately inform Mondi if the supplier or a third party, employed on behalf of the supplier, is unable to comply with the Code or if there are any material issues that may affect the requirements of this Code.

Suppliers may also be requested by Mondi to undertake individual performance assessments and obtain third party sustainability ratings (e.g. EcoVadis) to evaluate their risk profiles and ascertain compliance with this Code.

Mondi ultimately commits to ensure compliance with this Code. The supplier shall enable Mondi to verify compliance through meetings, teleconferences, document review and trainings, or, if necessary, on-site audits. Mondi will for this purpose act on a reasonable "need-to-know-basis".

Reporting non-compliances and grievances

At Mondi we are committed to conducting business all around the world with fairness and integrity. Acting with integrity while promoting transparency and responsibility throughout our value chain is of utmost importance for us. We take any form of misconduct very seriously.

If a supplier has any reason to suspect misconduct or other relevant non-compliance with this Code in its interactions with Mondi or any related party, the supplier must raise the respective concern and report the non-compliance to Mondi via SpeakOut.

The SpeakOut incident reporting platform is 100% confidential for all colleagues, customers, partners, and other stakeholders to report and raise concerns about any behaviour or activities which may conflict with Mondi's business ethics and values – it encompasses concerns relating to, e.g., potential bribery, discrimination, fraud, corruption, environmental pollution, major safety or health violations, harassment or any other human rights related topics.

SpeakOut is a secure platform operated by an independent third party and is available 24/7 in a broad range of languages, by dialling a free number from the local country or leaving a message online. Please refer to the Mondi [website](#) to find all Mondi's SpeakOut contact details.

Once an incident is reported, Mondi will review and follow up on the information received with the relevant party/ies. All concerns raised will be treated seriously and in the strictest confidence. Mondi will not tolerate any form of retaliation against anyone raising concerns in good faith.

Code of Conduct for Suppliers Review

This Code will be reviewed at least once a year or, when necessary, more frequently, to consider and incorporate any evolving environmental or social considerations.

Suppliers find the latest version of the Code in various languages at the [Mondi website in the suppliers section](#).

Queries

Should you have any questions regarding this Code please contact:

responsible.procurement@mondigroup.com

APPENDIX 1 LEGAL COMPLIANCE

Mondi operates in a global environment, and we maintain compliance with local, national, and regional laws and regulations and act in accordance with all international treaties and agreements.

We require our suppliers to:

- As a minimum, comply with all applicable laws, regulations, and treaties that are in force in the countries where they operate and those that are in force in the country where the products will be delivered and/or services will be provided. These include but are not limited to the UK Modern Slavery Act, the EU Deforestation Regulation, and the U.S. Lacey Act. Suppliers are also expected to conform their practices to generally accepted industry standards, obtain and maintain all applicable permits, licenses, and registrations, and operate in accordance with permit limitations and requirements at all times.
- Where our Code represents a higher standard than the local, national, or regional laws, we expect our suppliers to follow this Code. Conversely, when local, national, or regional laws are more restrictive than this Code, we expect our suppliers to follow those local, national, or regional laws.
- Comply with the applicable provisions of the national and international (re-) export control laws and regulations, including, but not limited to, the (re-) export regulations of the Republic of Austria, the European Union, and the United States of America. Furthermore, our suppliers shall check and ensure by appropriate measures that the products provided and/or services rendered are not violating any embargo of the European Union, the United States of America and/or the United Nations, including any restrictions on domestic transactions or anti-circumvention legislation. The supplier also must comply with the regulations of all relevant sanctions lists of the European Union, United States of America, and/or the United Nations regarding business transactions with companies, persons or organizations stated thereon. The supplier shall implement appropriate policies and programs to ensure compliance with these laws.
- Comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption, including, but not limited to, the UK Bribery Act 2010 and the Foreign Corrupt Practices Act of 1977 (“FCPA”) and to implement appropriate policies and programs to ensure compliance with these laws.
- Comply with all applicable competition compliance laws in all areas in which they operate and to implement appropriate policies and programs to ensure compliance with these laws.
- Comply with all tax related statutes or acts which might have an impact on Mondi, in particular, but not limited to, the UK Criminal Finances Act (received Royal Assent on 27 April 2017) dealing with the corporate criminal offence of the failure to prevent the facilitation of tax evasion and to implement appropriate policies and programs to ensure compliance with these laws.

In case any individual agreements with our suppliers include any stricter requirements than the above stated provisions, such individual agreements shall prevail.

APPENDIX 2 PRODUCT SAFETY, ENVIRONMENT AND CLIMATE

Mondi expects suppliers to share our values with regard to the environment, climate change and product safety (as set out in our [Sustainable Development Policies](#)) and to act in an environmentally responsible manner.

We require our suppliers, appropriate to nature of the business, to:

- Comply with all relevant laws, regulations, and environmental permits; proactively work to prevent violations, complaints, and emergencies, and if they occur, have in place systems and processes to adopt adequate preventive and corrective measures. Most critical cases shall be immediately communicated to Mondi.
- Have in place publicly communicated policies declaring adherence to responsible business practices related to product safety, environment, and climate, as well as willingness to implement internationally recognised Best Available Techniques (BATs).
- Have a good understanding of the environmental impacts of its products and services for example waste generated, air emissions, water discharges, soil contamination, land use change, and noise pollution. Establish appropriate plans and set targets to minimize these impacts in own operations and across the value chain.
- Have in place relevant and up-to-date quality management and environmental management systems (preferably according to credible third-party certification systems such as ISO 14001 or similar) to identify and manage significant environmental aspects appropriate to financial and impact materiality.
- Have in place due diligence and traceability systems (preferably according to credible third-party certification systems such as PEFC and FSC for wood-based products, or similar alternatives for other types of products) to minimise risks of controversial sources associated with unsustainable practices such as negative land conversion and deforestation, damage to protected areas and high conservation value areas, use of genetically modified organisms and hazardous materials, etc.
- Have in place an energy and climate change programme for the whole value chain that includes goals for improving energy efficiency, the preferred use of renewable energy, low carbon raw materials and transportation modes with lower emissions. The programme shall also aim to optimise logistics to limit indirect greenhouse gas emissions.
- Understand impacts on biodiversity and ecosystems in its production sites, as well as influences on high conservation value areas in the surroundings. In case of significant land use or land use change, implement biodiversity action plans that include goals for ensuring sustainable land management practices and nature conservation and/or restoration efforts in the landscape.
- Understand its water footprint and address water risks and opportunities as well as shared water challenges in the local catchment. In case of significant water use, implement a water stewardship programme that includes goals for maintaining a sustainable water balance, achieving good water quality, and ensuring good water governance.

- Meet the quality and safety standards for all their products and services required by applicable law.
- Manage their hygiene and product safety risks throughout the entire supply chain.
- Use of POPs (Persistent Organic Pollutants) listed in the Stockholm Convention, of PFAS (per- and polyfluoroalkyl substances) listed under REACH or CERCLA (the Comprehensive Environmental Response, Compensation, and Liability Act) and of priority substances listed in the Directive 2013/39/EU, which are used in the production of products supplied to Mondi, must be communicated to Mondi.
- Provide Mondi with up-to-date material safety data sheets, as applicable.
- Provide Mondi with environmental product footprint data of their products supplied to Mondi, on request, and any other relevant documents and information requested by Mondi.

APPENDIX 3 SAFETY AND OCCUPATIONAL HEALTH

We require our suppliers to:

- Comply with all applicable safety and occupational health standards, including governmental requirements and laws, operations- and facility-specific safety and occupational health requirements, and contractual requirements.
- Provide their employees, contractors, and subcontractors with a secure, safe, and healthy working environment.
- Have in place reasonable and necessary controls, including but not limited to engineering solutions, safety procedures, rules and issuing of relevant personal protective equipment, to reduce the risk of incidents, injuries, occupational health, and exposure to harmful hazardous substances.
- Have in place their own occupational health and safety policy.
- Have a documented health and safety management system, which provides for continuous monitoring and improvement of the working environment.
- Demonstrate senior management's commitment to occupational health and safety through audits and engagement with employees.
- Ensure that operational controls such as rules and procedures are in place and communicated to all employees.
- Ensure that its employees and contractors receive regular and appropriate occupational health and safety training.
- Report to Mondy immediately all health and safety incidents occurring on Mondy premises and investigate them properly. This may require participation into any incident investigations conducted by Mondy.
- Conduct regular workplace inspections and audits.
- Have emergency preparedness and response procedures in place.
- Where applicable, provide safe and healthy residential facilities and hygiene facilities, at least in accordance with the standards required by relevant local law.
- If applicable, adhere to all the requirements listed in the Safety Annex J or site specific SHE Requirements as provided by Mondy individually in each case (e.g. together with the contract template).

APPENDIX 4 LABOUR AND HUMAN RIGHTS

Mondi expects suppliers to provide a safe and fair working environment for its employees and contractors and to observe and respect internationally recognised human rights as described in the International Labour Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work and the ILO's eleven fundamental conventions, United Nations Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights the UN Guiding Principles on Business and Human Rights, and the United Nations Global Compact.

We require our suppliers to:

- Employ only workers who are legally authorised to work in their facilities and are responsible for validating employees' eligibility to work through appropriate documentation. If required by local law, all employees of a Mondi supplier must have employment contracts. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice.
- Treat all employees and contractors fairly and respectfully, encourage and promote an inclusive work environment that provides equal opportunities for all, in particular in relation to recruitment, compensation, benefits, promotion or termination and to prohibit any discrimination or harassment, in particular, but not limited to, on the grounds of gender, marital or parental status, ethnic or national origin, social background, sexual orientation, religious belief, political affiliation, age, disability, health status, or union membership.
- Provide their employees fair wages, benefits and working hours that meet legal or industry standards as a minimum.
- Respect the right of their employees to form and join trade unions of their choice and to bargain collectively without fear of retaliation.
- Not tolerate any instances of child labour (any person below the age of 15) and ensure that special protections are in place for young workers (those below the age of 18 and above legal minimum working age).
- Ensure their workplaces are kept free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, intimidation and verbal or sexual abuse, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits, deposits or recruitment fees as a condition of employment.
- Not tolerate any forms of inhumane or degrading treatment of employees or contractors (including misbehaviour of private or public security forces used).
- Not tolerate any forms of modern slavery (slavery, forced, compulsory or bonded labour, servitude, or human trafficking).
- Identify human rights risks and impacts, assess them, and implement appropriate management controls and corrective action, when relevant.
- Have in place adequate remedial mechanisms in case of any human rights violations.
- Notify Mondi immediately in writing if it becomes aware or has reason to believe that it or any of its officers, agents or companies operating within its own supply chain has breached any of the above requirements.

APPENDIX 5

BUSINESS ETHICS

Regrettably, bribery and corruption are a feature of corporate and public life in many countries across the world. Even the suggestion of corruption may damage the reputation of a company or group and affect its ability to do business. Mondi is aware of its corporate responsibility and supports actions being taken to create sustainable corporate integrity.

Mondi does not tolerate any form of bribery or corruption by Mondi employees, suppliers, and those with whom Mondi does business. All our employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Mondi Group.

Mondi requires its suppliers to acknowledge that all Mondi officers and employees are bound by the [Mondi Group Business Integrity Policy](#) as available on the Mondi Group-website in the section “Governance” under “Corporate Governance Code” and to confirm to fully compliance with it and to refrain from any way of endangering its compliance.