



Group Labor and Human Rights Policy

For more than 50 years, the Klöckner Pentaplast Group has been producing world-class innovative high-barrier protective films for leading companies across the globe. Our films safely package food, protect pharmaceuticals, and deliver products. We make film for everything from credit cards, to meat trays, to decorative surfaces to pharmaceutical and medical device packages. With a broad and innovative portfolio of packaging and product films and services, Klöckner Pentaplast plays an integral role in the customer value chain by safeguarding product integrity, assuring safety and consumer health, improving sustainability, and protecting brand reputation.

Our commitment

The Klöckner Pentaplast Group is committed to maintaining and improving our practices to ensure that human rights and equal opportunities for all individuals are upheld in our own operations and our supply chain, and that people are treated with dignity and respect throughout. We are committed to compliance with the letter and the spirit of the laws of all countries where we do business, and to conducting all of our business in accordance with high standards of international human rights, including the International Labour Organisation's Declaration on Fundamental Rights at Work, as well as the Universal Declaration of Human Rights and the International Bill of Human Rights¹ and the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights.

Frameworks for preventing specific abuses and further detail can be found in our [Code of Business Conduct and Ethics](#), as well as our annual [Slavery and Human Trafficking Statements](#). We expect our suppliers and supply chain to comply with our aims in this regard as well, and our expectations to suppliers are outlined in our [Supplier Code of Conduct](#) and [Sustainable Procurement Policy](#).

The Klöckner Pentaplast Group's (kp) commitment includes, but is not limited to the following fundamental topics:

- *Respect for Human Rights and the Dignity of all people*
kp respects the human rights of all individuals, and is committed to identify, prevent and or mitigate impacts to human rights resulting from our business activities through our due diligence and risk mitigation processes. kp expects its suppliers to uphold human rights in our supply chains as well, through our suppliers' own processes for human rights due diligence and risk mitigation processes.
- *Community and Stakeholder engagement*
At kp, we are committed to creating economic opportunity and fostering goodwill in the communities in which we operate. In many cases, this activity is done through locally relevant initiatives, beyond providing employment opportunities. In this process, we are committed to engaging with our community stakeholders, to ensure that we uphold their views, including any human rights issues related to our business.
- *Valuing Diversity and Equal Opportunities*
Diversity, equity and inclusion are core cultural values of kp. We are committed to a workplace culture that is fair and inclusive, and a culture that values and promotes diversity, equity and inclusion in everything we do; kp commits to providing equal opportunity for all employees and a working environment free of harassment, discrimination and bullying. More can be found in our [Group Diversity, Equity and Inclusion Policy](#).
- *Worker Health & Safety and Wages & Benefits*
As an organization, kp is committed to providing our employees with a [safe and healthy work environment](#) that safeguards their mental and physical wellbeing. kp commits to having proactive practices ensuring zero harm to everyone we engage with. In addition, we compensate employees competitively relative to the industry and local labor market. kp operates in full compliance with applicable minimum wage, work hours, overtime and benefits laws. We proactively benchmark against all local labor markets to ensure we compensate competitively, even in countries where there are no minimum wage laws.



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- *Career management and talent development*
In the modern competitive environment, employees need to replenish their knowledge and acquire new skills to do their jobs better. This will benefit both them and the company. We want them to feel confident about improving efficiency and productivity, as well as finding new ways towards personal development and success. We believe that by providing our employees with opportunities to learn and develop new competencies within their career path, we encourage them to engage with our company as they are more satisfied and challenged at work. We believe that training and development also helps us instill our culture and values. Development opportunities are available to all permanent, full-time or part-time, employees of the company. Employees with temporary/short-term contracts might attend trainings at their manager's discretion.
- *Freedom of Association & Collective Bargaining*
We respect our employees' right to join, form or not to join a labor union without fear of retaliation, intimidation or harassment. Where employees are represented by a legally recognized union and subject to local legal requirements, we are committed to establishing a constructive dialogue with their freely chosen representatives, and to bargaining in good faith with such representatives.
- *Modern Slavery and Child Labor*
Consistent with our obligations under the Modern Slavery Act, we are committed to preventing modern slavery, servitude, human trafficking, or any forced or compulsory labor anywhere in our supply chain, and expect our suppliers, vendors, and other third parties to avoid such practices. We will immediately cease business with any third party who we discover to be complicit in such practices, and will make any required reports to the relevant authorities. Further information may be found in our annual [Slavery and Human Trafficking Statements](#).
- *Avoiding the use of conflict minerals*
While there are no conflict minerals in the products kp manufactures, we monitor the possibility that these materials are used in our supply chains in small or trace amounts. kp is committed to conducting necessary due diligence to determine whether these minerals exist in any of our supply chains, and if so, kp is committed to performing due diligence to determine traceability. This commitment is also outline in our [Sustainable Procurement Policy](#).

Enforcement

Our [Code of Business Conduct and Ethics](#) (the kp Code) contains specific provisions addressing human rights, labor and business conduct and expressly states our commitment to the prevention of modern slavery, servitude, human trafficking, and any forced or compulsory labor. Every employee receives a copy of the kp Code during their on-boarding to the company, and through refresher training. Any employee who violates the kp Code will be subject to disciplinary action, up to and including termination of employment.

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¹ This includes three documents: The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights and The International Covenant on Economic, Social and Cultural Rights



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ABOUT THIS POLICY

- **Scope:** This policy applies to all kp employees, and to contractors, agents, consultants or any others working for or on behalf of kp. Where there are local legal or regulatory requirements, local requirements will take precedence. This policy will be monitored and reviewed regularly to ensure that it promotes best practice in the workplace
- **Communication:** We will communicate this policy to our customers, suppliers, local communities and other key stakeholders. All employees are responsible for reading, acknowledging and adhering to this policy. This policy is published for general knowledge on the corporate intranet and website.
- **Violations:** We have established procedures for employees to report any potential violations or possible risk, the procedures are outlined in the kp Code of Conduct. Whistleblower is granted anonymity and immunity.
- **Approval and revision:** The Sustainability management team is responsible for updating and reviewing this policy. The COO and Head of Sustainability is responsible for the final approval.

Revision Date	Document Authorizer	Document Initiator	Revision Details	New Review Date
March 2023	Yui Kamikawa VP Sustainability	Aida Cierco Senior Manager, Group Sustainability	New policy developed to align with kp's Sustainability Strategy.	March 2025
May 2024	Alan Richards COO and Head of Sustainability	Aida Cierco Group Sustainability Director	Policy updated with new authorizer	May 2026

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