



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](#).

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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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.

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.

We have established procedures for: (a) the submission by employees of Klöckner Pentaplast and others, on a confidential basis, of good faith concerns regarding violations of this Code and (b) the receipt, retention and treatment of complaints received by Klöckner Pentaplast regarding violations. These procedures are outlined in the [Code](#).

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