

# MM Supplier Code of Conduct

June, 2025

## Information for the reader

The Supplier Code of Conduct, amended time to time, represents Mayr-Melnhof Karton AG and its affiliated companies (hereinafter MM Group) and has been established to enhance transparency regarding MM's expectations in dialogue and cooperation with its suppliers. It is important to recognize that for established supplier relationships, this code serves as complementary and does not substitute any existing legal or contractual obligations between suppliers and MM.

## Legal notice

This Supplier Code of Conduct contains the fundamental mind set of MM. However, it cannot be understood to be the basis for demanding a certain type of behaviour from the MM or for establishing contractual claims against the company.

## Trainings

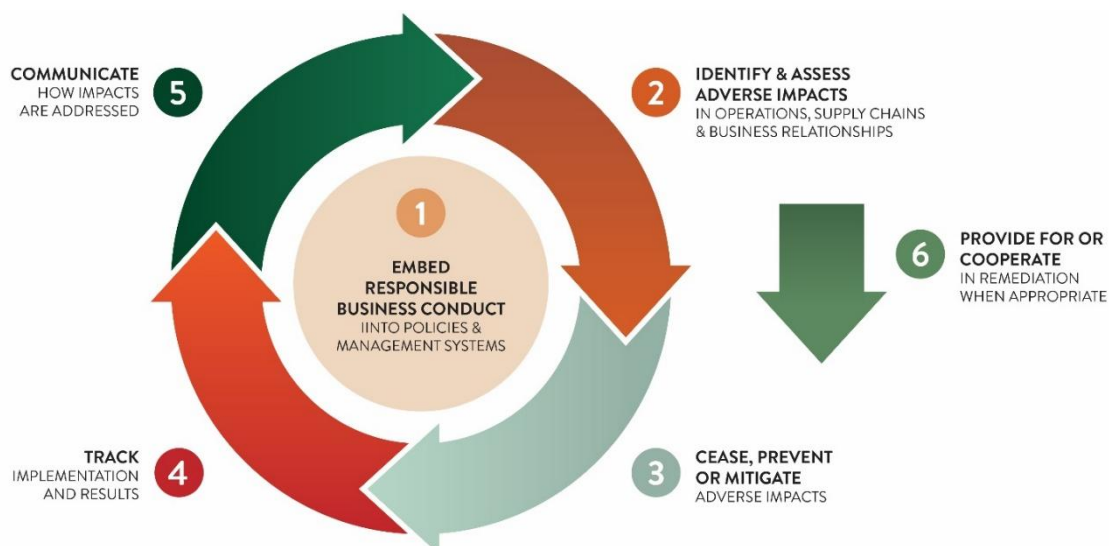
MM considers trainings as instrumental in upholding our commitment to responsible business practices. MM performs employee awareness trainings on topics outlined in this document and we expect our suppliers to integrate similar initiatives and trainings into their operations to promoting responsible and sustainable practices and to build awareness of MM's expectations.

## MM Integrity Line

Should you identify misconduct or non-compliance with this Supplier Code of Conduct or unlawful behaviour that concerns MM, the welfare of MM employees as well as external contractors or other stakeholders, we request you to report this through the MM Integrity Line (completely anonymously, if you wish): <https://mmgroup.integrityline.com>

*Figure 1. MM is dedicated to fostering responsible and sustainable business practices and follows the guideline of OECD including its own operations as well as its upstream and downstream value chain.*

<https://www.oecdguidelines.nl/oecd-guidelines/due-diligence>



# MM Supplier Code of Conduct

## Introduction

MM is committed to building fair and ethical relationships with its suppliers. The MM Supplier Code of Conduct, which is based on the MM Code of Conduct, forms a foundation for our collaboration. You can access the MM Code of Conduct on our official website: <https://mm.group/>.

## General Obligations

MM Group is committed to upholding ethical and legal standards throughout our whole value chain. This Supplier Code of Conduct consist of the fundamental principles that represent the minimum standards suppliers must comply with. MM is committed to upholding these principles and expect the same of its suppliers as well as their suppliers, with special emphasis on adhering to the

- ILO core labour standards
- the Guiding Principles of the UN Global Compact Initiative
- the principles outlined in the OECD Guidelines for Multinational Enterprises

These principles form an integral part of our supplier management process and are subject to continued monitoring efforts.

MM's commitment to upholding and respecting internationally recognized human rights at the highest corporate level is underpinned by our Policy Statement on Human Rights. To support these commitments and ensure compliance with minimum safeguards, our due diligence processes are based the following topics:

- **Code of Conduct Alignment**  
Suppliers must adhere to the principles outlined in this Supplier Code of Conduct or an equivalent Code of Conduct they may have in place.
- **Chain of Compliance**  
Suppliers must ensure that their suppliers and sub-suppliers also adhere to the principles defined in this code. A comprehensive commitment to compliance extends through every tier of the supply chain.
- **Regulatory Adherence**  
Suppliers must uphold relevant laws and regulations of the countries where their operations are conducted.
- **Transparent Documentation**  
Suppliers must maintain transparent documentation to affirm compliance with laws, regulations, and the ethical requirements in this code.

## Respect for Human and Labour Rights

As part of our mission to ensure ethical practices throughout our operations and value chain, suppliers are expected to conduct human rights due diligence, proactively identifying and addressing potential adverse impacts.

- **Prohibition of Forced Labour and Modern Slavery**  
Suppliers must unreservedly reject any form of forced labour or discrimination. Suppliers must commit to implement appropriate policies, processes, and procedures to identify and eliminate instances of modern slavery within their operations and supply chains.
- **Child Labour**  
MM has a firm commitment against child labour within our own company and among our business partners. Suppliers must adhere to international standards, particularly ILO Conventions C 138 and C 182, ensuring that their employees meet the minimum age requirements mandated by law.
- **Fair Recruitment Practices**  
Suppliers must comply with ethical recruitment practices and relevant regulations. In cases where workers have paid recruitment fees, immediate effective remedies, including compensation and rehabilitation, are mandated. Workers' rights to leave their employer without undue constraints and to be free from deposits, payments, or surrender of identity papers must be safeguarded.
- **Working Hours and Remuneration**  
Working hours should adhere to local laws or standards that offer the utmost protection to workers. Employees must be granted adequate time off as permitted by national law. Fair compensation, meeting or exceeding national minimum wage legislation, is a non-negotiable requirement for workers, whether directly or indirectly contracted by the supplier. Suppliers must ensure that migrant workers are treated fairly and their rights are respected.
- **Freedom of Association and Collective Bargaining**  
Respect for employees' rights to freedom of association and collective bargaining is paramount. Suppliers must commit to these rights and recognize employees' ability to form and join unions.
- **Anti-Harassment, Non-Discrimination and Equal Opportunities**  
Suppliers must combat all forms of discrimination and harassment based on gender, race, skin colour, religion, age, national or ethnic origin, disability, or sexual orientation. Suppliers must uphold the principle of equal treatment when assessing employees and applicants. Our commitment to diversity and inclusion extends to our suppliers, who are encouraged to actively include small and diverse suppliers in their base and partnerships.
- **Respect for Privacy**  
Suppliers must establish technical and organizational safeguards to ensure compliance with relevant data protection regulations.



MM Global HR Policy is committed to upholding the standards of human rights across our global workforce bases on the OECD Guidelines for Multinational Enterprises as well as the UN Universal Declaration of Human Rights, the ILO core labour standards, and the International Bill of Human Rights. MM monitors ethical issues, including child labour, forced labour and discrimination incidents. In the event of an incident, we confront suppliers and stakeholders, including our downstream value chain, regarding the specific incidents and ensure the implementation of measures to avoid similar incidents in the future. We control the progress against these measures and provide an adequate remedy up to the termination of the contract with the supplier.

### **Occupational Safety and Health (OSH)**

We expect our suppliers to demonstrate to upholding occupational health and safety (OSH) standards throughout the value chain.

- **Compliance with Legislation and Standards**  
Suppliers must meet or exceed all the relevant safety and health legislation and standards, establishing a safety climate through a shared perception where “all should return home safe every day”.
- **Safety Training**  
Suppliers must provide appropriate safety training for their personnel. By equipping employees with the necessary information, knowledge, and skills, you contribute to maintaining a safe and secure work environment.
- **Monitoring and Documentation**  
Suppliers must monitor and document their OSH performance diligently. This includes tracking incidents, near misses, and other relevant data to identify potential hazards and the ability to take preventive action before they result in incidents or accidents.
- **Incident Reporting and Investigation**  
In the unfortunate event of an OSH incident, suppliers must promptly report and thoroughly investigate the matter. This proactive approach to incident management helps prevent future incidents and strengthens the overall safety culture.

MM promotes safety and health at work in order to protect all of its employees, temporary workers and visitors. We have therefore established a distinct Safety Policy, committing to safety and health legislation and standards applicable to MM and all its subsidiaries.



## Responsible Business practices

We expect our suppliers to adhere to responsible business practices and the following principles in their operations.

- **Anti-Corruption and Anti-Bribery**

MM insist on a strict policy against bribes or any form of unlawful payment or financial benefit. Suppliers must align with regulations against corruption and bribery and establish robust policies, procedures, and controls to prevent fraud, theft, embezzlement, and financial misstatement. Transparency is key, and any incidents must be immediately reported to us.

- **Conflicts of Interest**

MM expects its suppliers to avoid any conflict of interest relating to financial interests or other arrangements with MM 's employees that may be considered inappropriate. Any potential conflicts of interest, including associations with our employees or their immediate family members, should be disclosed transparently before engaging in business relationships. To ensure integrity, accepting gifts or benefits that could lead to conflicts of interest must be avoided, with exceptions for customary hospitality and nominal gifts.

- **Anti-Money Laundering**

Suppliers must adhere to regulations against money laundering and have stringent processes in place to prevent illicit funds from entering the legal economic cycle. Combating the financing of terrorism is paramount, and any incidents must be reported to us.

- **Fair Competition and Market Conduct**

Ensuring unrestricted, fair competition is of utmost importance in all the countries where our suppliers operate. MM expects its Suppliers to avoid any business practices which have as their object or effect the prevention, restriction or distortion of competition. Engagement in associations and information exchange must be for legitimate reasons and comply with applicable laws.

- **Trade Compliance**

Suppliers must adhere to **all applicable** import and export controls, sanctions, and other trade compliance laws. Accurate and truthful information must be provided to customs and authorities as required.

- **Quality and Product Safety**

The quality and safety of supplier products must meet legal and industry standards, aligning with our standards and customers' high expectations. This is particularly vital in maintaining product and food safety while upholding hygiene standards.

- **Information Technology and Data Protection**

We prioritize the ethical and legal use of information systems and data protection. Suppliers must implement robust IT security measures to protect data and information and ensure adequate



supplier assessment procedures. Personal data must be processed in compliance with relevant data protection regulations and MM Information Security Policy.

- **Business Continuity Management**

Suppliers must recognize and mitigate risks related to business continuity in both production and the value chain. Preparation for emerging global risks like pandemics, natural disasters, cyberattacks, and terrorism is also expected.

- **Controversial Weapons**

We oppose any involvement with controversial weapons such as antipersonnel mines, cluster munitions, chemical weapons, and biological weapons. This commitment extends not only to our investments but also to our suppliers, who must likewise commit to these safeguards. We ensure that neither our business operations nor our supply chain includes companies engaged in the manufacture or sale of these weapons.

At MM, we embrace responsible business practices as an integral part of our commitment to ethical conduct and sustainability. To counter the risk of possible non-compliance with standards, laws, rules of conduct and, if applicable, voluntary declarations, through a variety of measures: We subject our internal and external processes to continuous monitoring and, in this context, we continuously verify that our business conduct complies with applicable legal provisions, in cooperation with external experts.

## **Community Engagement**

As we continue to build relationships based on transparency, respect, and collaboration, we expect our suppliers to uphold these principles.

- **Small and Diverse Businesses**

We encourage to supporting and engaging with small and diverse suppliers.

- **Respecting Land Rights**

Suppliers must honour the land tenure rights of impacted communities, abiding by the principle of free, prior, and informed consent.

- **Mitigation of Negative Impact**

Suppliers must contribute to the positive social and economic growth of affected communities, enriching their quality of life and engage in open and productive conversations with communities, addressing concerns and collectively devising solutions. Suppliers must proactively mitigate any adverse effects arising from their operations in communities, considering environmental, social, and economic dimensions.

At MM, we recognize that our business has a significant impact on the communities in which we operate. We value the well-being and rights of these communities and we are committed to engaging with them in a manner that promotes positive social and economic development. MM also actively pursues goals

centred around diversity and inclusion with regard to our employees, as well as small and diverse businesses.

## Environmental Responsibility

As part of our shared commitment to environmental responsibility, we expect our suppliers to embrace the following environmental principles in their operations:

- **Regulatory Compliance and Impact Assessment**  
Suppliers must not only adhere to relevant environmental regulations and standards but also assess how their operations and sourcing impact the environment.
- **Environmental Permits, Approvals and Diligence**  
Suppliers must acquire, maintain, and update all necessary permits, approvals, and registrations. Operational and reporting mandates associated with these authorizations must be followed diligently.
- **Continuous Improvement**  
Suppliers must establish a comprehensive evaluation process that supports progression and results in a reduction in environmental impact.
- **Greenhouse Gas (GHG) Emissions Reduction**  
Suppliers must establish operational control, monitoring, and reporting mechanisms to decrease greenhouse gas emissions throughout their operations and value chain. This includes addressing GHG emissions under Scope 1, 2, and 3.
- **Biodiversity and Resource Efficiency**  
Suppliers must commit to safeguarding biodiversity, maintaining responsible use of raw materials, energy, and water.
- **Environmental Incidents**  
Suppliers must systematically manage and communicate environmental incidents and complaints to MM if affected. Suppliers must also appoint a designated representative who oversees environmental improvements, embedding a culture of sustainability within their operations.
- **Deforestation Mitigation**  
MM only sources deforestation free wood- and wood-based materials. Suppliers using materials, that are relevant to deforestation, must commit to a deforestation free origin and ensure compliance with applicable legislations e.g. EUDR.
- **Data Sharing for Assessments**  
Upon request, suppliers must provide data for assessments, product life cycle evaluations, and product declarations.

Our commitment to preserving and supporting natural ecosystems is anchored in MM Environmental and MM Forest Policy. It goes beyond the boundaries of our own practices at MM, across the supply chain. We have established dedicated environmental strategies and targets and expect our suppliers to engage with us for mutual development projects. Our Decarbonisation Strategy bases on Science Based Targets aligned with limiting global warming to 1.5 degrees by 2031 by implementing appropriate measures.

## **Supplier Assessments**

MM retains the right to verify the adherence of our suppliers to the principles outlined in this Supplier Code of Conduct. We expect our suppliers to align with these principles and proactively participate in the following.

- **Assessments**  
On request suppliers must complete assessment questionnaires and allow MM audits on their premises ensuring alignment with our principles or relevant standards. This cooperative approach to verification plays a central role in upholding our shared dedication to ethical standards.
- **Labour Provider Assessments**  
Suppliers who rely on labour providers are required to establish a process for conducting annual compliance assessments. The aim is to ensure compliance with labour and human rights standards. By conducting a thorough risk assessment, suppliers must determine what level of assurance is necessary. In instances where the risk associated with recruitment is elevated, it is upon suppliers to contract third-party audits.

In our commitment to responsible business practices, MM places great emphasis on accountability and transparency. To ensure compliance with this Supplier Code of Conduct, MM conducts systematic supplier assessments based on dedicated supplier assessment questionnaires.

## **Monitoring**

The foundation of our partnership is the shared commitment to responsible practices. In this regard, we expect our suppliers to follow our ethical compliance standards and carry out diligent monitoring within their operations. This includes the following key obligations in order to share commitment to responsible practices.

- **Traceability and Transparency**  
Suppliers must establish and uphold a traceability system that not only adheres to legal standards but also ensures effectiveness. This system must enable traceability back to the source, providing the MM Group with visibility to this information as necessary. Suppliers must abstain from engaging in





any activity that compromises the integrity of the materials they provide and bear the responsibility of evaluating their value chains for potential risks of adulteration and substitution.

- **Comprehensive Controls**

Suppliers must anticipate implementing robust controls that guarantee the fulfilment of the principles outlined in this Supplier Code of Conduct. Furthermore, a steadfast commitment to continuous enhancement in accordance with these requirements is imperative.

- **Remediation and Compliance**

Suppliers must not only acknowledge instances of non-compliance but also take effective measures to remedy any non-compliance promptly.

While the main contract between MM and suppliers may include separate termination clauses, it is important for both parties to understand that a violation of this Supplier Code of Conduct may be considered a material breach of the main contract. This entitles MM to terminate the main contract.

At MM, we take proactive steps to ensure the adherence of our suppliers to ethical standards.

- **Whistleblowing**

Our confidential reporting channel, in line with Directive (EU) 2019/1937, is accessible at <https://mmgroup.integrityline.com> to facilitate the disclosure of breaches related to the provisions of this Supplier Code of Conduct, internal guidelines, MM regulations, and legal requirements. Reports received are meticulously investigated, ensuring compliance with legal mandates. Any form of retaliation against individuals who highlight violations will not be tolerated. Suppliers and any of its employees must immediately report to MM any non-compliance with this Supplier Code of Conduct.

- **Risk assessment**

We monitor and assess our supply chain risks comprehensively. Our 360° risk- scoring methodology encompasses climate-related and CSR concerns in general. Specific Supply Chain Intelligence Tools are used to assess compliance with specific regulations or requirements e.g. EUDR or economic sanctions. In the event of actual incidents, we engage suppliers through a multi-tiered mechanism: We address the specific incident directly, request preventive measures from the supplier, and subsequently monitor the progress of these measures to ensure effective resolution.

**Should you have any questions**

about this Supplier Code of Conduct, please contact: [responsible.sourcing@mm.group](mailto:responsible.sourcing@mm.group)

END OF DOCUMENT

| Version | Date          | Policy Owner                                      | Approved by                                | Scope  |
|---------|---------------|---|--|--------|
| 1.0     | December 2023 | Group Sustainability Department                   |  | Public |
| 2.0     | June 2025     | Head of Sustainability & Marketing Communications | Management Board of Mayr-Melnhof Karton AG | Public |