



Human rights policy

Version	Owner (dept. or function)	Target audience	Approved by	Approval date	Review frequency	Reviewed topics
1.1	Legal dept.	Value chain, employees	ExCom	April 2024	At least every 3 years	/
1.2	Legal dept.	Value chain, employees	ExCom	May 2025	At least every 3 years	Reassign one target to another policy

I. Introduction

This policy focuses specifically on human rights, including labour rights of employees.

Indeed, at VPK Group, respecting people and human rights is at the core of our culture and values. We are committed to respecting and promoting human rights frameworks outlined in Title III below. We strongly believe that people are the essence of a sustainable, future-oriented and resilient way of doing business. By doing so, we ultimately strive to contribute to a better planet for all who are part of it.

II. Scope

We respect and promote human rights in **our own operations and our entire value chain.**

Therefore, we seek to ensure that **all of our stakeholders, including employees, customers, suppliers, contractors, shareholders** and ultimately, the **end users of our products**, are treated with respect at all times. In this context, we believe particular focus should be given to groups who may be at greater risk due to their vulnerability, such as indigenous peoples, women, national or ethnic minorities, religious and linguistic minorities, children, persons with disabilities, and migrant workers and their families.

However, our commitment should not stand alone. We therefore also have high expectations of our employees and all members of our value chain and expect them, too,



to be at least equally committed to respecting and promoting human rights (*cf. VPK Group's Code of Conduct and Supplier Code of Conduct*).

III. Commitments

VPK Group sets out its approach towards human rights in the *VPK Group's Code of Conduct*, the *Supplier Code of Conduct*, the *Privacy and Data Protection Policy*, and commits to keep its approach in line with the following international human rights frameworks:

- The Universal Declaration of Human Rights
- The ten principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises

We acknowledge that respect for human rights on a global scale remains an ongoing challenge, filled with complexities of many natures. VPK Group wishes to be part of the solution. We strongly believe that the path forward is based on collaboration and engagement. Therefore, we perform recurrent risk maps of our supply chain to identify and assess possible human rights risks and actively work together towards better compliance with human rights, followed by an active evaluation of the effectiveness of measures taken to respond to such risks. We will not knowingly remain passive in case of adverse human rights impacts. In case of non-compliance, we expect continuous improvement based on a transparent milestone approach. Failure to do so or the mere detection of violations such as human trafficking, forced labour or child labour will result in a termination of the commercial relationship (*cf. VPK Group's Sustainable Procurement Policy and Supply Chain Standard*).

We strive to conducting a similar procedure to monitor and guide our customers towards compliance with human rights.

We are committed to providing or supporting access to remedy when we find or become aware of adverse human rights impacts on individuals or communities caused by our business activities in the widest meaning possible, including our upstream or downstream value chain (*cf. VPK Group's Whistleblowing Policy*).

We aim at reporting transparently about our human rights impacts by means of our yearly Sustainability Report (published on our website).



Finally, we provide all of our internal and external stakeholders a dedicated whistleblowing system by means of which grievances concerning any possible breach of human rights legislation can be reported, even anonymously (<https://www.vpkgroup.com/en/whistleblowing-system>; *VPK Group's Whistleblowing Policy and VPK Group's Supplier Code of Conduct*). We investigate all concerns raised on a thorough and impartial basis and do not tolerate retaliation for reports made in good faith.

IV. Targets

We aim at the following targets:

- By the end of 2027: 90% of VPK Group's employees¹ will have undergone mandatory training on the Code of Conduct (with focus on anti-bribery and corruption) and whistleblowing system

V. Responsibility and governance

The Board of Directors and the Executive Committee are responsible for the strategy and approach on human rights and have set out clear roles and responsibilities within VPK Group in order to achieve coordinated action. The Sustainability Steering Committee is in charge of monitoring the targets.

KPI stewards: HR- and legal department, reporting to the Sustainability Steering Committee and the senior management.

¹ Employees with a VPK email address