

# **DIVERSITY & INCLUSION POLICY**

## Purpose

We believe it is the differences in people – not uniformity – that are key to Mondi's success. The geographic, cultural and personal diversity of the business is one of our greatest strengths. We strive to create an inclusive environment where differences are respected and valued. We want to inspire our people and offer them a wide range of learning experiences, so they can grow and be inspired in our company.

The purpose of this Diversity & Inclusion ("D&I") Policy is to support fair and non-discriminatory working practices and compliance with equality and discrimination legislation in the jurisdictions within which we operate. We also aim to promote diversity and an inclusive work environment across the Group.

We treat all our employees, contractors and workers, whether part-time, full-time or temporary, fairly and with respect. Selection for employment, engagement, promotion, training or any other benefit is based on skills, behaviour and ability to perform.

## Policy

As a global organisation, we are committed to employing, inspiring, empowering and developing our people with the necessary skills and ability required to expand their careers and become valuable participants in sustaining our competitive business advantage. As the management of people is a function and responsibility of line management, so is the creation of a culture that embraces inclusion and diversity.

We recognise that in some jurisdictions within which we operate employment equality is entrenched in legislation. Where local legislation conflicts with this Policy, we will comply with the law, while maintaining our commitment to human rights and providing examples of good practice through our own business conduct and sphere of influence.

In line with our philosophy of encouraging diversity and inclusion, we provide equal opportunities for all, irrespective of gender, or gender reassignment, marital or parental status, ethnic or national origin, race or colour, social background, HIV status, disability, sexual orientation, religion or belief, political opinion, trade union membership, age or other characteristics. We are focusing on increasing the diversity of our workforce at all levels in the organisation.

Where possible and relevant, we work together with external parties such as NGOs, local and international organisations and other key stakeholders for joint solutions on specific issues and projects.

This policy supports our Labour and Human Rights Policy (see: <u>https://www.mondigroup.com/en/sustainability/governance-of-sustainability/</u>)

# Policy guidelines

### Board and committees

• The board of Mondi plc (the "Board") supports the achievement of diversity and inclusion across all levels of the organisation.

- The Board supports the principles and targets outlined in the FTSE Women Leaders Review and is committed to ensuring gender diversity on the Board, its committees and across the Executive Committee and in direct reports to the Executive Committee.
- The Board supports the principles set out in the Parker Review relating to ethnic diversity on boards and among senior management. While we are committed to increasing ethnic diversity within our management team, we acknowledge that in certain jurisdictions where collection and storage of data relating to protected characteristics are prohibited, our efforts will be focused on fostering diversity through alternative means while adhering to local laws and respecting employee privacy.
- Search firms used for appointments to the Board will be requested to include qualified female candidates as well as candidates from a variety of ethnic backgrounds.
- Appointments will continue to be made on merit against objective criteria, in the context of the overall balance of skills and backgrounds that the Board and its committees require in order to remain effective and to support the achievement of Mondi's strategy.
- Where possible, Mondi will only engage executive search firms that have signed up to the Voluntary Code of Conduct for Executive Search Firms and best practice.
- The Board and its committees will review at least annually succession plans in relation to the Board, Executive Committee and the wider Group, as well as diversity across the Group, and the composition of the Board, its committees and the Executive Committee, taking into account skills, experience and diversity requirements.
- Mondi commits to complying with the seven UN Women Empowerment Principles.

# All employees

- All recruitment activities will be fair and will adhere to our D&I Policy and any requirements prescribed in applicable employment/equality legislation in jurisdictions in which we operate.
- When reviewing succession plans, we aim to ensure that a sufficient pipeline of highcalibre candidates of diverse backgrounds are considered, and that succession planning is fair, equitable and non-discriminatory across the Group and in compliance with local legislation.
- We will aim to ensure that at Group, business unit, business segment and site management function level the nationalities of the candidates at long and short list stages are appropriately representative of our international footprint, subject to the availability of candidates with the necessary qualifications and experience.
- We are committed to ensuring fair and equal opportunities for training and development, and providing programmes and learning experiences that focus on shaping inclusive behaviours within the Group, and encouraging the participation of underrepresented groups within the workforce.
- We will set targets where meaningful and will monitor and report as appropriate against these targets and other initiatives taking place within the Group to promote diversity and inclusion.

# Suppliers

We expect our suppliers to adhere to standards of equal opportunity without discrimination within their operations. We are committed to transparency and collaboration with our suppliers to improve D&I practices in our value chain. We will require our suppliers to commit to our Code of Conduct for Suppliers<sup>1</sup> and seek commercial relationships that adhere to our commitment with human rights.

## Governance

<sup>&</sup>lt;sup>1</sup> https://www.mondigroup.com/about-mondi/our-suppliers/

It is the ultimate responsibility of the Board, supported by the work of the Nominations and Sustainable Development Committees, to oversee the implementation of, and to regularly monitor progress under, the D&I Policy. Line management and executives at all levels of the organisation have responsibility to implement the policy and ensure progress against its guidelines.

Mondi has established a Group D&I function within the Group Human Resources Department, to support the D&I agenda across Mondi's operations. Additional governance is provided through the D&I Steering Committee.

The Steering Committee functions as a body of oversight as well as a sounding board to ensure the activities undertaken by the D&I team are producing the maximum impact throughout the Group.

Moreover, the Steering Committee members ensure the necessary management attention and work as ambassadors of the cause to spread the D&I strategy and mindset throughout Mondi.

All employees have individual responsibility to follow the procedures introduced to ensure equal opportunity and non-discriminatory practices.

We place emphasis on training as an important enabler of this policy, and are committed to providing targeted training to our leadership and employees, on this policy and related policies, on inclusive behaviour, on mentoring, and on other aspects that support our D&I objectives across the Group.

We are committed to transparency on our D&I practices and approach and put systems in place to monitor and report on these and on progress against our objectives, both internally and externally.

Stakeholder inclusiveness is a key aspect of our D&I practices beyond our boundaries, and we are committed to effective representation and participation of local communities in practices and decisions that affect them.

### Incident reporting and grievance mechanisms

All employees are encouraged to raise any concern or grievances about discrimination or harassment and any other conduct that is contrary to our Code of Business Ethics. In the first instance, concerns are reported directly to line management or HR.

When employees do not feel comfortable directly addressing the concern internally, they can use SpeakOut. SpeakOut is our anonymous whistleblowing and grievance platform. It 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 matters including 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. All SpeakOut contact details are available via Mondi's external website. Once an incident is reported, Mondi will review and follow up on the information received with the relevant third-party. 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.

We periodically evaluate SpeakOut, to ensure its effectiveness in identifying and addressing practices and incidents that may violate this policy, as defined by Principle 31 of the UN Guiding Principles for Business and Human Rights.

### Monitoring

This policy will be enforced through regular monitoring and review and will form part of the Board's annual agenda.

History of revisions:

Adopted: 13 October 2020 Revision: 23 January 2024