

Approved by **Board of Directors**
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Owner **Director Supply Chain and IT**

Supplier Code of Conduct

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1. Background and purpose

With many years of experience as well as deep knowledge and expertise, Nordic Paper offers products that are contributing to the transition to a fossil-free society and a circular bioeconomy.

Nordic Paper wants to continue to minimise the negative impacts of its operations through cooperation with stakeholders across the entire value chain – from extraction of raw materials to end use and recycling – and by taking active steps together to increase the positive impact through the products.

This Supplier Code of Conduct, sCoC, sets out the requirements that Nordic Paper has on business partners, consultants, agents, distributors and other co-operating partners and suppliers (hereinafter referred to as "Suppliers"), that deliver goods and/or services to the company. This document is an integrated part of all business relations between the Suppliers and Nordic Paper. By adhering to this sCoC, suppliers contribute to the creation of a responsible and sustainable business relation.

2. General and Legal Compliance

The Supplier must adhere to local, national and international laws and regulations relevant to their business operations. This includes, but is not limited to, labour laws, work environment and environmental regulations, anti-corruption laws, data protection laws or any other laws applicable to the products or services provided. The relevant laws and regulations must be communicated, including adequate education, to concerned employees and business partners.

The Supplier must allow its employees to raise concerns, without fears of retaliation, reporting of wrongdoings in the subject area covered in this sCoC.

3. Responsible business

Nordic Paper does not tolerate any form of corruption or fraud from any of its Suppliers. This means that the Supplier may not participate in any form of corruption, bribery, extortion or other unethical business methods. The Supplier must not give, promise, offer, request or receive compensation or benefits that violate applicable laws and good business practice or that can affect, or be perceived to affect, the objectivity of decisions.

The Supplier must not enter into discussions, agreements or information sharing with competitors concerning pricing, market sharing or other similar activities which could have anti-competitive effects.

The Supplier must strive to avoid and prevent conflicts of interests between itself and Nordic Paper.

The Supplier must be aware of, and comply with, applicable sanctions affecting their business and ensure that there is no action to procure goods, materials or services including logistics from any legal or physical person subject to applicable sanctions and export control laws. The Supplier shall apply adequate controls to ensure its and its suppliers' compliance with the sanctions and export control laws that are deemed to be in force.

In addition to this neither the Supplier, nor persons directly or indirectly controlling it or any of its representatives, are legal or physical persons subject to sanctions and export control laws.

4. Human and labour rights

The Supplier must support and respect the protection of international recognized human rights and not participate in crime against those rights. This includes but is not limited to discrimination, equal rights, privacy, accessibility and freedom of expression for their own operations or stakeholders.

The Supplier's employees must have a written, understandable, and legally binding employment contract.

The Supplier must at least pay their employees the lowest salary and overtime compensation that is stated in applicable law and/or collective agreements.

Furthermore, the Supplier must ensure regular working hours to be applicable according to applicable law and/or collective agreements.

The Supplier must not employ any person below the minimum age specified by national laws and regulations or the age of compulsory education, whichever is higher.

The Supplier shall recognise the rights of young labour to be protected from economic exploitation and from work that is hazardous or interferes with the individual's education or moral, social, spiritual, mental or physical development.*

The Supplier must respect and protect the privacy of its employee's personal and sensitive information.

Employees must in no case be subjected to harsh, inhuman or offensive treatment or any form of punishment. No form of involuntary labour may be used, and the Supplier must recognize the employee's right to organize, belong to a trade union and negotiate collectively.

* In accordance with International Labour Organization (ILO) Convention No. 138 on Minimum Age for Admission to Employment.

5. Safety and occupational health

The Supplier must prioritize the health and safety of all their employees, contractors and other stakeholders. The Supplier and its operations must offer a safe working environment, where health, safety and wellbeing are prioritised.

Active and preventive work on the work environment must be conducted and risks must continuously be evaluated, and protective measures taken to prevent accidents and injuries.

6. Environment

The Supplier is expected to not only follow the laws and regulations but also work proactively to prevent and reduce the environmental impact. This includes working in a preventive way to do its utmost to avoid accidents that can affect production and the local community or can adversely affect the environment. Furthermore, the Supplier must ensure that there are prepared routines, to be able to effectively act in an appropriate manner in such events.

In addition, Nordic Paper strongly recommends the Supplier to measure and set goals for improvements in order to contribute to continuous improvements and to work for a resource-effective use of raw materials and energy

7. Information Security

The Supplier must implement measures to protect the security and confidentiality of data, including compliance with data protection laws and regulations. Suppliers must implement appropriate access controls to ensure that only authorized personnel have access to sensitive information. This includes using as strong as practically possible authentication and limiting access to data on a need-to-know basis.

Suppliers must regularly review and update their security measures to protect against evolving threats and vulnerabilities and continuously evaluate and improve their information security practices addressing emerging threats and mitigate risks.

8. Product Safety

Suppliers must ensure that all products, including chemical products, provided to Nordic Paper meet or exceed applicable local, national, and international safety regulations and standards.

Suppliers are accountable for the safety of their products and must stay informed about changes in regulations and update their products accordingly. Furthermore, the Supplier must take responsibility for promptly addressing any safety-related issues or any changes in the composition of the products to Nordic Paper.

9. Monitoring

The Supplier must take actions to steer and have control over its operations throughout the entire supply chain to secure compliance with this sCoC. To make credible that the steering and control is adequate, the Supplier must assess, prevent and handle risks related to this sCoC and ensure and monitor in a proper manner that its own suppliers, subcontractors and employees follow it.

The Supplier is obliged to immediately report deviations from this sCoC to Nordic Paper. Additionally, Nordic Paper offers a whistleblowing function that allows Suppliers to anonymously report any suspected serious misconduct that conflicts with our values and ethical principles and that could significantly impact our business or an individual's life or health.

Nordic Paper or a third party may carry out an inspection/audit of the Supplier's business. Nordic Paper must in good time notify the Supplier prior to such an inspection/audit.

10. References

- Code of Conduct
- Code of Conduct Agents
- Anti Bribery and Anti-Corruption Procedure
- OHS Policy
- Environmental and Energy Policy

The Supplier's compliance with this sCoC and its content is a prerequisite for all business relationships with Nordic Paper

In case of serious deviations/breach of this sCoC, that is to be considered as a material breach of contract which gives Nordic Paper the right to immediately terminate the business relationship with the Supplier.

We hereby confirm that we will meet the requirements in this sCoC:

Company name
Place and date
Name of signatory
Title of signatory