

Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

Nordic Papers statement on slavery and human trafficking 2024

Nordic Paper is dedicated to managing and developing its operations in a responsible and sustainable manner throughout the entire value chain. Nordic Paper (or “we”, “our”, “us”) is committed to respect human rights and ensuring that our supply chain is free from forced labour and child labour.

This report is made pursuant to the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

About Nordic Paper

Nordic Paper is a global niche player in the pulp and paper industry and our business is based on long and close relationships with customers worldwide. We produce unbleached kraft paper and natural greaseproof paper at 5 production plants located in Sweden, Norway and Canada. Our headquarter is located in Karlstad, Sweden.

In 2024, Nordic Paper had Net sales of SEK 4.67bn and about 700 employees.

Our commitment

Nordic Paper’s [Supplier Code of Conduct](#), [Code of Conduct](#), and [HR Policy](#) set out provisions for labour standards and human rights in our own operations and in the supply chain. Nordic Paper are committed to offer fair terms and conditions of employment and our policies support the principles contained in the United Nations universal Declaration of Human Rights and the International Labour Organization Fundamental Principles and Labour Standards.

Supply chain

Nordic Paper works with more than 2000 suppliers, and the vast majority of our purchases of input goods and services comes from suppliers based in Europe,

Our Policies

Supplier Code of Conduct

The Supplier Code of Conduct, sCoC, sets out the requirements that Nordic Paper has on its suppliers that delivers goods and/or services to the company. The sCoC is an integrated part of all business relations between the Supplier and Nordic Paper. By adhering to it suppliers contribute to the creation of a responsible and sustainable business relation. The sCoC states that the supplier must adhere (i.e. communicate and educate) local, national and international laws and regulations relevant to their business operations which includes,

but is not limited to, labour laws, work environment and environmental regulations. The supplier must allow its employees to raise concerns, without fears of retaliation, reporting of wrongdoings in the subject area covered in the sCoC. The sCoC also states that Nordic Paper does not tolerate any form of corruption or fraud which 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 support and respect the protection of international recognized human rights and not participate in crime against those rights. All suppliers must abide by the Guiding Principles on Business and Human Rights as well as the ILO Declaration on Fundamental Principles and Rights at Work and must work to combat all forms of child and forced labour, corruption and bribery. This includes but 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.

Nordic Paper reserves the right to immediately terminate the business relationship with any supplier that cannot demonstrate compliance with the sCoC.

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

Code of Conduct

Nordic Paper's Code of Conduct (the Code) is the framework that helps us translate values into actions and describe how we act as employees and how we conduct business. It also outlines expectations of employees and business partners and what our stakeholders can expect from us. We and are committed to offering fair terms and conditions of employment. Our Values, Code, talent development strategies and employment policies support the principles contained in the United Nations Universal Declaration of Human Rights and the International Labor Organization Fundamental Principles and Labor Standards.

Nordic Paper:

- Provide fair and equitable wages, working hours, benefits and other conditions of employment in accordance with applicable laws.
- Recognize and respect employees' right to freedom of association and collective bargaining - Provide human and safe working conditions
- Prohibit forced labour, child labour, and human trafficking and ensure that any association with the Company is made by free choice.
- Promote a workplace free of discrimination and harassment

HR Policy

Nordic Papers HR Policy states we are devoted to offering fair terms and conditions of employment. Nordic Paper is committed to pay market salaries and apply differentiated and individual pay setting, within the limits set by pay agreements, based on the difficulty and responsibilities of the position and the individual's performance. Minimum wage requirements, statutory or contractual, must be complied with. Our employees shall have a written contract of employment. To secure non-discrimination of any kind we do annual surveys, analyse and if needed implement action plans according to the results given.

Due Diligence Processes

Reporting channels

Nordic Paper provides a whistleblowing service which gives all our customers, suppliers, contractors and employees an opportunity to anonymously report suspicions of misconduct. Anything that goes against applicable laws and regulations, our values and ethical code or may seriously affect our organisation or a person's life or health is to be reported, in good faith. To ensure anonymity, the service is managed by an external partner and the channel is encrypted and protected, all messages are processed in confidence and can be reported by phone or in writing at [our website](#) or internal SharePoint at any time.

Supplier evaluation

Each year an evaluation is conducted for suppliers deemed to affect the quality of what is delivered to Nordic Paper's customers. This evaluation is based partly on the supplier non-conformance reports received during the year, i.e. the documented complaints that Nordic Paper makes when a supplier fails to deliver as agreed or to meet other agreed requirements, and partly on interviews with customers and those receiving goods and services. The parameters used in this assessment include quality, technical support, lead times and sustainability aspects such as certifications. In 2024 a total of 30 suppliers were evaluated, seven of which were rated very good, and the remaining ones received a passing rating.

Core Labour Requirements assessment

Nordic Paper, including outsourced warehouses, also conduct a self-assessment according to the FSC® Core Labour Requirements based on the ILO: s 8 conventions concerning child labour, forced labour, discrimination and freedom of association and the right to collective bargaining. The assessment is verified by an accredited third-party auditor.

Risk of forced labour and child labour in our business operations and supply chain

Operations

Given that our business operations are located in Sweden, Norway and Canada, all employees in Scandinavia are covered by collective bargaining agreements and the majority of all employees in Canada. In addition, Nordic Paper has policies and procedures in place to help ensure compliance with applicable laws and therefore we consider the risk of forced labour and child labour occurring in our business operations to be low.

Supply chain

Our suppliers are located in countries with high Human Freedom Index score, 8-9 out of 10, in Europe and North America ([Human Freedom Index: 2024 | Cato Institute](#)). In addition, Nordic Paper has policies in place that help us ensure compliance so that the risks are considered as low.

Steps taken to assess and manage the risks of forced labour and child labour in our operations and supply chain

Operations

Nordic Paper does not employ anyone permanently if under the age of 18 years old. Temporary vacation employment from 16 years of age can occur if it is permitted according to national regulations and law but is never allowed from a temporary employment agency. Social security number is always checked, and most of all contracts are signed with national bank identification. All employees, including temporary vacation employees and substitutes, sign the Code of Conduct.

Supply chain

All suppliers undergo a validation before contracted and all suppliers Nordic Paper enter into agreements who have a spend of more than SEK 1 m or more than 24 orders over a rolling 12-month period are obliged to sign the supplier Code of Conduct. A signed Code of Conduct is valid for 5 years and the validity period is continuously monitored.

If we sign an outsourcing agreement with a subcontractor, e.g. warehouse facility, they need to sign a specific document with requirements regarding labour standards and human rights based on the ILO Core Conventions principles.

UN Global Compact

Nordic Paper is a signatory member of the UN Global Compact and adheres to the ten principles since 2023. As a signatory we actively support human rights and shall conduct the business consistently with the principles of the Global Compact, the International Bill of Human Rights and the ILO Core Conventions.

Remediation measures

Nordic Paper has not identified any non-compliance to the Act during the reporting period and thus not implemented any measures to report on.

In case of suspected non-compliance to our policies and procedures, if child labour or forced labour is suspected or confirmed in our operations or supply chain, Nordic Paper would endeavour to take appropriate remedial action.

If a supplier is found to be non-compliant of our Supplier Code of Conduct Nordic Paper has the right to immediately terminate the business relationship with the supplier.

Approval

This report on efforts to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act has been prepared by Nordic Paper to meet the requirements during the reporting year 2024.

In accordance with the requirements of the Act, and in particular section 11, I attest that I have reviewed the information contained in this report, and based on my knowledge the information in the report is true, accurate and complete in all material aspects for the purposes of the Act for the reporting year above.

I confirm that I have the necessary authority to represent Nordic Paper,

Signature: _____

Full name: Henrik Essén

Title: Director of Sustainability and Communication

Date: May 30, 2025