

UPM Report Misconduct channel is operated by an external service provider, People Intouch, through a system called SpeakUp. This document explains to how SpeakUp works in practice and how UPM deals with the reports. This document is published by UPM. In case of questions about the document please contact: codeofconduct@upm.com

SpeakUp[®]

Introduction

Leaving a message

You can leave a (new) message via the SpeakUp® web system:

Please go to www.speakupfeedback.eu/web/upmsuppliers

Select the language in which you would like to leave your message.

You will be asked to enter the following access code: **00218**

Have a pen ready when leaving the message. You will receive a personal six-digit case number, which is randomly generated. It is very important that you write this down, as you need it to check the response from UPM when you come back to SpeakUp® later.

When you use the SpeakUp web system, you can type in or simply copy/paste your message. It also allows you to upload documents to your message. When you are finished, you can press the 'send message' button; a screen with your case number and message will appear, which can be easily printed out.

What happens in the meantime...

The moment you have sent your message, People Intouch starts the translation of the message into English (if necessary).

Once the transcription and translation is done, the exact message - both in the original language as in English - will be sent to the Head of Internal Audit and the Chief Compliance Officer at UPM. The Head of Internal Audit or the Chief Compliance Officer will evaluate the message and send a response to People Intouch.

People Intouch will translate the response and post it on the SpeakUp system.

Reading your response

Within a week, a response will be ready for you on the SpeakUp system. In general, you can find this response via the same way you have left your message, using the dial-in details mentioned above.

If you notice that a response has not been left for you yet, please be assured that the message is being reviewed and that a response will be available for you in a few working days. It is wise to check for a response regularly.

If you have lost your case number, we ask you to leave your message again with a new case number. If you had written down your message for your first call, this will not take up much of your time. Use the new case number for all further communication.

Investigating the reports

All reports coming in through the UPM's Report Misconduct channel will be made available to the Head of Internal Audit and the Chief Compliance Officer at UPM. They evaluate and assess the information received and determine the appropriate course of action. This will, in most cases, result in the responsibility for next steps being assigned to the most appropriate person.

The Head of Internal Audit and the Chief Compliance Officer will ensure that all reported cases are investigated and documented appropriately. Misconduct reports are reviewed carefully, personal data handled appropriately, and confidentiality of reports maintained to the extent possible. UPM does not tolerate retaliation against any person who, in good faith, reports suspected misconduct or participates in an investigation to resolve suspected misconduct.

The privacy statement for UPM's Report Misconduct Channel (as updated from time to time) describes the manner in which UPM collects and processes personal information in relation to internal investigation and reports submitted through the UPM Report Misconduct channel. The privacy statement is available at: <https://privacy.upm.com/report-misconduct-privacy-statement>