

UPM Supplier and Third Party Code

Introduction

UPM aims to be a trustworthy business partner and believes that responsible and ethical practices create long-term value for both UPM and its stakeholders. UPM has recorded its commitment to integrity in its Code of Conduct. Our leading principle is that we do not compromise our standards of integrity under any circumstances and we expect the same from our suppliers and third party intermediaries.

All UPM suppliers and third party intermediaries (e.g. agents, consultants, advisers, joint venture partners, local partners or distributors acting on behalf of UPM) shall comply with the standards established in this UPM Supplier and Third Party Code. The Supplier and Third Party Code defines the minimum level of performance that UPM requires from all of its suppliers and third parties.

The most recent version of the Supplier and Third Party Code is available from the UPM website.

1. Commitment to integrity

The UPM Supplier/Third Party shall:

- Comply with all applicable laws and regulations.
- Inform UPM immediately if the supplier or third party is unable to comply with the Supplier and Third Party Code.

2. Respect people and human rights

The UPM Supplier/Third Party shall:

- Comply with the United Nations Universal Declaration of Human Rights, fundamental conventions of the International Labour Organization (ILO) and the 10 principles of United Nations Global Compact.
- Respect universal human rights such as freedom of thought, opinion, expression, religion and right to assemble peacefully, as well as freedom from any discrimination based on e.g. race, age, nationality, gender or sexual orientation.
- Respect the fundamental ILO conventions and local legislation regarding working time and compensation, to ensure no forms of forced or child labour is used at any of its operations or activities and not to employ workers under the age of 15. If forced or child labour is found in any of the operations, the supplier or third party shall inform UPM immediately and undertakes to remedy the situation in accordance with principles acceptable to UPM.
- Ensure the health, safety and security of employees, visitors and other people impacted by its operations.
- Comply with UPM's safety requirements when working at or visiting at UPM premises and carry out necessary safety training.

3. Take care of environmental impact and product safety

The UPM Supplier/Third Party shall:

- Minimise negative environmental impact to land, water, biodiversity and air.
- Manage any waste generated from its operations or from products or customers' assets in its possession, including the treatment of hazardous waste according to legislation and manufacturer's instructions.

4. Zero tolerance for corruption and bribery

The UPM Supplier/Third Party shall:

- In no circumstances directly or indirectly pay, give, offer or approve bribes to government officials or to private individuals.
- In no circumstances directly or indirectly receive, solicit or accept a bribe from any party.
- Refrain from any activity that could even create the appearance of bribery, corruption or other impropriety.
- Maintain adequate procedures to prevent corruption and bribery in its operations.
- Inform UPM immediately if any corruption or bribery is observed among UPM employees.

5. Business transparency

The UPM Supplier Third Party shall:

- Be a legal entity duly organised and legitimately existing under the applicable laws.
- Have the right to conduct its business, enter into an agreement with UPM and perform its obligations thereunder.
- Maintain a valid liability insurance and an adequate insurance policy with a reputable insurer for liabilities which might affect UPM.
- Be aware of the risks to which it is subject, have adequate risk mitigation procedures and notify UPM immediately if the risks might have an impact on UPM's business.
- Comply fully with all applicable tax legislation and pay all taxes and other official payments as established by authorities.
- Comply fully with all applicable anti-money laundering laws and trade sanctions regimes.

6. Compliance with competition laws

The UPM Supplier/Third Party shall:

- Comply with all applicable competition laws and not conclude or engage in competitively-prohibited agreements, trade practices or meetings with customers, distributors, suppliers or other business partners, or otherwise engage in any anti-competitive practices.

7. Protect assets and information

The UPM Supplier/Third Party shall:

- Handle UPM's assets with care.
- Protect UPM's confidential information against unauthorised use or disclosure.
- Not publish any announcements, press releases or other public disclosures concerning UPM without UPM's approval.
- Respect others' intellectual property rights.
- Avoid all conflicts of interest with UPM and notify UPM immediately if any such instances occur.

8. Source responsibly

The UPM Supplier/Third Party shall:

- Know and select its business partners carefully in order to identify and mitigate the risks of becoming involved in illegal business activities or violation of any requirements of this Supplier and Third Party Code.
- Keep complete and accurate records of all business transactions.
- Promote the requirements described in this Supplier and Third Party Code to additional stages in their supply chain.

9. Engage with stakeholders and society

The UPM Supplier/Third Party shall:

- Communicate with their stakeholders openly and transparently and promote dialogue with stakeholders.
- Make a positive contribution to the well-being and development of their local communities, whenever possible.
- In instances where business is conducted with local governments, ensure that anti-corruption laws are not violated and cooperation is accomplished in compliance with the principles of this Supplier and Third Party Code.

10. Compliance belongs to everybody

The UPM Supplier/Third Party shall:

- Permit UPM to verify compliance with this Supplier and Third Party Code through on-site audits conducted by internal or external resources.
- Respond to UPM's surveys in a timely manner.
- Understand that the violation of laws or of this Supplier and Third Party Code, or failure to take corrective action, is considered by UPM to be a breach of contract and may entitle UPM to terminate the business relationship with the supplier or third party.
- Provide employees with means to raise their concerns anonymously about misbehaviour or to suggest improvement or give general feedback.
- Report immediately to UPM any suspected or observed breach of this Supplier and Third Party Code. An anonymous report may be made via:

Web: www.upm.com/reportmisconduct

Email: reportmisconduct@upm.com

Post: UPM-Kymmene Corporation
Head of Internal Audit/Complaint
P.O. Box 380
FI-00101 Helsinki
Finland

Reports of misconduct will be carefully reviewed by UPM, and will be kept strictly confidential to the fullest extent possible.