

UPM Supplier and Third-Party Code

Introduction

UPM's aim is to be a trustworthy business partner, and it believes that responsible and ethical practices create long-term value for both UPM and its stakeholders. UPM has stated 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, advisers, joint venture partners, local partners, or distributors acting on behalf of UPM) need to comply with the standards set in this UPM Supplier and Third-Party Code or demonstrate their compliance with similar standards defined in their own code of conduct or company policies.

UPM's Supplier and Third-Party Code defines the minimum level of performance that UPM requires from all its suppliers and third parties. There are additional requirements for certain materials and services.

UPM Supplier and Third-Party Code is based on the ten principles of the United Nations Global Compact initiative, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

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

1. Commitment to integrity

The UPM Supplier/Third-Party needs to:

- Comply with all applicable laws and regulations.
- Inform their UPM contact person 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 needs to:

- Respect universal human rights such as freedom of thought, opinion, expression, religion and freedom from any discrimination based on e.g. race, age, nationality, gender or sexual orientation or any form of harassment.
- Respect local laws on working time and compensation, freedom of association, and right to collective bargaining.
- Respect children's rights and not use or tolerate the use of child labour. Follow minimum age set by local laws or International Labor Organization's (ILO) definition of minimum age of 15 years, whichever is higher.

- Ensure no form of forced labour is used or tolerated in any of its operations or activities.
- Ensure the health, safety, and security of its employees and visitors as well as other people impacted by its operations.
- Comply with UPM's safety requirements when working at or visiting UPM sites and carry out necessary safety training.

3. Taking care of the environmental impact and product safety

The UPM Supplier/Third-Party needs to:

- Minimise their negative environmental impact on land, water, biodiversity, climate, and air.
- Manage any waste according to applicable laws and the manufacturer's instructions.
- Ensure that its products are safe for the use they are meant for.

4. Zero tolerance for corruption and bribery

The UPM Supplier/Third-Party needs to:

- Never pay, give, offer, or approve bribes to government officials or to private individuals under any circumstances, directly or indirectly.
- Never receive, solicit, or accept a bribe from any party under any circumstances, directly or indirectly.
- Never, under any circumstances, engage in any form of corruption or other improper or illegal business practices, such as extortion, embezzlement, or fraud.
- Maintain adequate procedures to prevent corruption and bribery in its operations.

5. Business transparency

The UPM Supplier/Third-Party needs to:

- Be a legal entity that is duly organised and legitimately exists under applicable laws.
- Have the right to conduct its business, enter into an agreement with UPM, and perform its obligations accordingly.
- Be aware of the risks it is subject to, have adequate risk mitigation measures in place, and notify UPM immediately if the risks might have an impact on UPM's business.
- Comply fully with all applicable tax laws and pay all taxes and other official payments as set by the authorities.
- Comply fully with all applicable anti-money laundering laws and trade sanction regimes.
- Disclose to UPM any actual or potential conflicts of interest relating to its activities as a UPM supplier or third-party intermediary. These include personal affiliations between employees of supplier/third-party intermediary and UPM as well as any material financial interests UPM employees may have in the supplier's/third-party intermediary's business.

6. Compliance with competition laws

The UPM Supplier/Third-Party needs to:

- Comply with all applicable competition laws and not make or engage in any agreements, trade practices, or meetings with customers, distributors, suppliers, or other business partners that could be considered distorting competition, or otherwise engage in any anti-competitive practices.

7. Protect assets and information

The UPM Supplier/Third-Party needs to:

- Handle UPM's assets with care.
- Protect UPM's confidential information against unauthorised use or disclosure.
- Process personal data in accordance with applicable laws.
- Never publish any announcements, press releases, or other public disclosures concerning UPM without UPM's approval.
- Respect the intellectual property rights of UPM and other parties.

8. Know with whom you trade

The UPM Supplier/Third-Party needs to:

- Know and select its business partners carefully 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.
- Promote the requirements described in this Supplier and Third-Party Code or similar standards to other parties in their supply chain.
- Keep complete and accurate records of all its business transactions.

9. Engaging with stakeholders and society

The UPM Supplier/Third-Party needs to:

- Communicate with its stakeholders openly and transparently and promote dialogue with them.

10. Compliance involves everyone

The UPM Supplier/Third-Party needs to:

- Give UPM permission to verify compliance with this Supplier and Third-Party Code through dialogue and, if considered necessary by UPM, through on-site audits. Reasonable notice will be given for the audits, conducted by UPM's internal or external resources.
- Respond to UPM's surveys precisely and in a timely manner.
- Understand that UPM will consider a violation of laws or this Supplier and Third-Party Code or a failure to take corrective action a breach of contract, and this may entitle UPM to terminate the business relationship with the supplier or third-party.
- Make it possible for employees to voice their concerns about misbehaviour or to suggest improvements or give general feedback anonymously.

- Report immediately to their UPM contact person any suspected or observed breach of this Supplier and Third-Party Code that may affect the business relationship or UPM. An anonymous misconduct report, including one concerning UPM employees, can 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

UPM will review carefully reports of misconduct and keep them strictly confidential to the fullest extent possible.