



UPM Slavery and human trafficking statement 2024

This slavery and human trafficking statement (“Statement”) has been issued by UPM-Kymmene (UK) Ltd and UPM Raflatac (UK) Ltd (“UPM UK entities”) pursuant to Section 54 of the Modern Slavery Act 2015. The Statement has been adopted by the Board of Directors of each of the entities on June 26, 2025, and signed by one of the directors respectively. The Statement describes the steps taken during the financial year 2024 to ensure that slavery and human trafficking are not taking place in UPM UK entities’ business or supply chains.

1. Organizational structure, business and supply chains

The UPM UK entities, both 100% owned by UPM-Kymmene Corporation (“UPM”), are responsible for the provision of specific manufacturing, sales support and supply chain services in the United Kingdom in accordance with formal business operating models of UPM. The UPM UK entities manufacture and sell graphic papers and labelling solutions respectively and employed at the end of 2024 approximately 400 employees. Sourcing of goods and services needed for the production and sales by the UPM UK entities takes place in the UK, Europe and from countries outside Europe.

For more information on UPM business please visit: www.upm.com

2. Policies in relation to slavery and human trafficking

UPM group level policies are applicable to all activities of its subsidiaries globally, including the UPM UK entities.

The UPM Code of Conduct sets out UPM’s general principles of business integrity and outlines UPM’s respect for human rights, in accordance with the UN Guiding Principles on Business and Human Rights. It is expressly stated in the UPM Code of Conduct that UPM does not tolerate the use of forced labor under any conditions. UPM Code of Conduct is applicable to all UPM employees worldwide and available at: [Code of Conduct | A material solutions company](#)

The UPM Code of Conduct is complemented by UPM Human Resources Rules available at: [Working conditions | A material solutions company](#). Aligned with the UPM Code of Conduct the UPM Human Resources Rules explain in more detail UPM’s stance on forced labor and fair working conditions. UPM Human Resources Rules are applicable to all UPM employees worldwide.

The UPM Code of Conduct is also complemented by UPM's Sustainability Policy Statement, which addresses responsible business practices and related processes in more detail. It is available at: [UPM Sustainability Policy Statement | A material solutions company](#)



UPM is in its Code of Conduct committed to responsible sourcing practices. All UPM suppliers and third-party intermediaries need to comply with the standards of the UPM Supplier and Third-Party Code or demonstrate their compliance with similar standards.

UPM's Supplier and Third-Party Code defines the minimum level of performance that UPM requires from all its suppliers. This includes commitment to respect people and human rights, including to ensure no form of forced labor is used or tolerated in any of the supplier's operations or activities. UPM expects its suppliers to ensure that their suppliers and sub-contractors that contribute to products or services to UPM comply with the UPM Supplier and Third-Party Code or similar standards. The UPM Supplier and Third-Party Code is complemented with a Practical Guide explaining the requirements in more detail. Both UPM Supplier and Third-Party Code and the Practical Guide are available at: [UPM Supplier and Third-Party Code | A material solutions company](#)

3. Due diligence processes

UPM has ongoing due diligence processes to identify, prevent, mitigate and account for how UPM addresses its adverse impacts on people or the environment. In terms of human rights and environmental due diligence in its supply chain, UPM uses a risk-based approach that consists of various elements applied before and during the onboarding of new suppliers and monitoring of business partners. These elements include counterparty screening, enhanced due diligence and Know Your Supplier screenings, forest and other certification systems, third-party sustainability assessments by EcoVadis, and the high sustainability risk supplier framework and model. UPM also conducts regular supplier audits and contractor reviews. In 2024, UPM carried out 97 (95) supplier audits and reviews globally. Read more: [UPM Annual Report 2024, Sustainability Statement](#) (p. 225)

With an external expert, UPM has identified its salient human rights issues, i.e. human rights that are at risk of the most severe negative impact from UPM's operations or business relationships. UPM regularly analyses the saliency of its human rights impacts based on severity and likelihood, recognizing that UPM's impacts on people continue to evolve as its business changes, and its approach to due diligence develops. UPM has identified forced labor as a salient human rights risk in some of UPM's contracted services and global supply chains and recognizes migrants as a particularly vulnerable group of workers. UPM does not use or tolerate the use of forced labor in any form in its own operations or in its supply chains. Read more: [UPM Annual Report 2024, Sustainability Statement](#) (p. 225)

UPM monitors and works to remedy adverse impacts on human rights of which it is aware, and which its activities have caused or contributed to. In the event of a violation of a human rights or environmental obligation, UPM determines the necessary and appropriate measures on a case-by-case basis. Remediation is determined case by case, based on verified impacts. Read more: [UPM Annual Report 2024, Sustainability Statement](#) (p. 211)



4. Risk assessment and management

UPM identifies high risk suppliers and high-risk value chains by looking at the country of origin of the supplier (based on reliable third-party risk indexes focusing on environmental, social and governance -related risks) and the risk associated with the manufacturing and the supply chain of the sourced product or service. Risk assessments can be extended to several tiers, especially when commodities are originating from forestry, agriculture, and mining. High-risk suppliers are assessed either by a third party (Ecovadis) or internally by UPM.

Before UPM enters a contract with its supplier, it ensures a prospective supplier's commitment to the UPM Supplier and Third-Party Code.

Moreover, all wood and pulp sourced by UPM are either FSC™- or PEFC-certified (FSC N003385, PEFC/02-44-41) or comply with the FSC Controlled Wood standard or Due Diligence requirements for PEFC. FSC Controlled Wood requirements include wide criteria related to the legality of the wood, respecting social and traditional rights (incl. indigenous and tribal peoples' rights) and safeguarding areas of high conservation values.

Read more about our supplier requirements at: [Requirements | A material solutions company](#)

UPM monitors its business partner portfolio, including suppliers, against several official data sources by using an automated screening tool. In case of an alert actions are taken to manage the identified risk.

Supplier audits are used to verify a supplier's conformance with UPM's supplier requirements, including UPM Supplier and Third-Party Code. In recent years, the focus of such audits has been on social responsibility issues. Supplier audits are regularly conducted by trained UPM auditors and by qualified external auditors.

UPM is a member of the Together for Sustainability (TfS) initiative that has established a standard approach for evaluating and improving the sustainability performance of suppliers. UPM uses the standard to assess the human rights and environmental supplier risks further and to scale up the coverage of our risk assessments.

Any concerns about forced labor, human trafficking or slavery can be reported through UPM's Report Misconduct channel, which is accessible online by both UPM employees and people outside the company. The channel is operated in a system called SpeakUp by an external service provider with the same name. The service is available in multiple languages, and it can be accessed 24 hours a day, 7 days a week. Submitting a report is fully confidential and can also take place

anonymously. Local stakeholders can also raise their concerns directly to UPM representatives at the operating sites and mills and via locally provided channels such as e-mail and phone. Read more: [Report misconduct | A material solutions company](#).

5. Training on modern slavery and trafficking

All UPM employees receive training on UPM Code of Conduct. Moreover, there is a separate training covering UPM Supplier and Third-Party Code targeted for UPM employees dealing with business partners. Connection between human rights violations and corruption is also handled in UPM Anti-Corruption training that is mandatory for all salaried employees. Read more: [UPM Annual Report 2024, Sustainability Statement](#) (p. 211)

UPM Supplier and Third-Party Code video is used to communicate our expectations to suppliers. The video is available at: [Responsible sourcing | A material solutions company](#)

UPM Sourcing function arranges additional training for their personnel on responsibility principles and supplier requirements. In addition, UPM Sourcing co-operates continuously with suppliers to ensure compliance with the UPM Supplier and Third-Party Code.

6. Monitoring and evaluation

UPM reviews the effectiveness of its risk management procedures quarterly through its Compliance system. Read more: [UPM Annual Report 2024, Sustainability Statement](#) (p. 227)

As part of report of the Board of Directors, UPM publishes its statutory Sustainability Statement, which is based on the Corporate Sustainability Reporting Directive. Additionally, responsibility information is reported in accordance with the standards of the Global Reporting Initiative (GRI)

More information on UPM's reporting:

- [Reporting and data | A material solutions company](#)
- [UPM Annual Report 2024](#) (p. 30-32, 358-359)

Signatures



Bryan McMurdo
Member of Board of Directors
UPM-Kymmene (UK) Ltd



Shaun Johnson
Member of Board of Directors
UPM Raflatac (UK) Ltd