



# METSÄ GROUP SUPPLIER CODE OF CONDUCT

---

Metsä Group is a forerunner in sustainable bioeconomy, utilising renewable wood from sustainably managed northern forests. Metsä Group consists of Metsäliitto Cooperative, its two businesses Metsä Forest and Metsä Wood, and the Cooperative's subsidiaries and associated companies Metsä Tissue, Metsä Board, Metsä Fibre and Metsä Spring. Our vision is to be the preferred partner in developing sustainable business. This can only be achieved by having a network of responsible business partners.

We are committed to integrity, sustainability and high standards of business ethics as reflected in the Metsä Group Code of Conduct, and expect our suppliers to commit to equal standards. Each supplier and its relevant group companies are expected to comply with Metsä Group's Supplier Code of Conduct and any additional requirements agreed in the supply agreements.

## LAWS AND REGULATIONS

The supplier is obliged to comply with the applicable laws and regulations of those countries where it conducts business.

## RESPECT FOR HUMAN AND LABOUR RIGHTS

The supplier is expected to respect internationally recognised human rights as declared in the UN Universal Declaration of Human Rights and ILO Labour Standards. Suppliers shall

commit to act in compliance with the UN Guiding Principles on Business and Human Rights. The supplier shall take action to remedy any adverse human rights impacts it may cause. Special attention should be paid to possible adverse impacts on groups or individuals that may be at higher risk of vulnerability, such as migrant workers.

### Prohibition of forced labour

Forced labour in any form is forbidden. This includes modern slavery, human trafficking and bonded labour. Withholding wages or identity documentation, restricting movement, recruitment fees and the use of threat or intimidation are forbidden.

### Prohibition of child labour

Child labour in any form is forbidden. The supplier shall always comply with the ILO Minimum Age Convention (no. 138) and shall further ensure that young employees' health, safety, development or school attendance is not jeopardised.

### Fair employment practices

Wages, including overtime and benefits shall equal or exceed the level required by applicable laws and regulations, and shall always constitute a living wage. Suppliers shall comply with applicable laws, international conventions, and industry standards on working hours. The supplier shall ensure that all workers have a signed employment contract in a language that is understandable to them, including information about their rights, responsibilities and employment conditions.

## Freedom of association and collective bargaining

The supplier is obliged to respect its employees' legal right to freedom of association and right to collective bargaining.

## Equal opportunities and non-discrimination

The supplier is expected to commit to providing equal opportunities for all its personnel and not to allow discrimination. No one shall be discriminated based on gender (including pregnancy), age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, other personal characteristics or any other reason not based on the requirements of the work.

## Anti-harassment

Harassment in any form is forbidden. The personal dignity of every individual must be respected. The supplier shall ensure that no harassment or any other unacceptable behaviour takes place in its organisation, including sexual harassment, insults, bullying, intimidation, threats, abuse, exploitation or violence.

## Respect for privacy

The supplier is expected to respect everyone's right to privacy, and process personal data in compliance with good data processing practices and applicable legislation.

## HEALTH & SAFETY

The supplier is obliged to provide a safe and healthy working environment to prevent accidents, injuries and illnesses, and when applicable, provide safe and healthy residential facilities, with applicable local law as a minimum. The supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, transportation, storage, recycling, and disposal. The supplier shall ensure that employees are aware of and trained in these issues. An occupational health & safety management system according to ISO 45001 / OHSAS 18001 or any equal system shall be in use as applicable.

## RESPONSIBLE BUSINESS PRACTICES

### Confidentiality

The supplier shall protect confidential business information, agree to use such information only for the jointly agreed purpose and limit the disclosure to those who have a strict need to know such information to carry out cooperation with Metsä Group.

### Anti-corruption

Corruption and bribery in any form is forbidden, including obtaining or attempting to obtain a personal benefit or business advantage through improper or illegal means. The supplier should never offer gifts, hospitality or other benefits to Metsä Group's personnel that are more than reasonable in value. No gifts or hospitality are allowed during a tendering or other decision-making process.

### Avoiding conflicts of interest

Conflicts of interest in any form must be avoided. The supplier has an obligation to openly disclose any potential conflicts of interest to Metsä Group when becoming aware of them.

### Fair competition

The supplier shall compete fairly, shall not participate in cartels and shall always act in compliance with applicable competition law.

### Trade compliance

The supplier is expected to comply with applicable trade embargoes, sanctions and customs import and export regulations. Any activity related to terrorist financing is strictly forbidden. Metsä Group expects to be informed without delay of any changes affecting the supplier's ability to comply with applicable trade compliance requirements.

### Anti-money laundering and tax evasion

Money laundering in any form is forbidden. All taxes and tax-like charges must be reported and paid duly in accordance with applicable laws. The supplier is expected to take all necessary precautions to prevent any participation in activities related to money laundering or tax evasion.

### Product safety

All products and services must meet the legal requirements and quality and safety criteria specified in contracts. The supplier must manage the hygiene and product safety risks across the supply chain. The supplier must use raw materials of known origin and ensure the traceability of raw materials and finished products, and is obliged to provide this information to Metsä Group on request. The supplier must ensure that delivered products are safe for people and the environment.

### Business continuity management

The supplier shall be aware of risks related to business continuity in both production and the supply chain. The supplier shall also have a mitigation plan for all key business continuity risks. The supplier shall also take into consideration preparing for emerging global risks such as pandemics, natural disasters, cyberattacks and terrorism.

## RESPECT FOR THE ENVIRONMENT

The supplier shall comply with environmental regulations and standards applicable to their operations, and shall observe environmentally aware practices in all their operating locations.

The environmental burden shall be minimised, and performance in respect of environmental matters shall be improved continuously, including the protection of biodiversity and efficient use of raw materials, water and energy, as well as responsible land ownership, acquisition and use. The supplier is recommended to set greenhouse gas emission reduction targets, e.g. in line with the Science Based Targets Initiative method. An environmental management system according to ISO 14001 or similar system shall be in use as applicable.

## CONTINUOUS DEVELOPMENT

The supplier is expected to have appropriate controls in place to ensure that the requirements described in this Supplier Code of Conduct are fulfilled. Further, the supplier shall commit to continuously develop its operations with respect to these requirements.

## SUPPLY CHAIN

The supplier shall have appropriate controls to ensure that all its suppliers recognise and respect the requirements of this Supplier Code of Conduct or the supplier's own equivalent code of conduct.

## MONITORING

Metsä Group conducts systematic supplier assessments and audits to ensure the compliance of this Supplier Code of Conduct. Metsä Group's online Compliance and Ethics Channel is open to supplier personnel for reporting breaches of this Metsä Group Supplier Code of Conduct. Reporting can be done anonymously.

The supplier shall commit to correcting any non-compliance. The supplier shall also ensure that its employees and stakeholders have an opportunity to raise concerns or grievances, and that there are appropriate practices for handling such cases.

The rights and privacy of anyone raising a concern in good faith shall be protected, and no form of retaliation shall be tolerated.