

UPM Supplier and Third-Party Code

Introduction

UPM strives to be a trustworthy business partner, and it believes that responsible and ethical practices create long-term value for UPM and its business partners and other 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, representatives, joint ventures, joint venture partners, local partners, and distributors) 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 Supplier and Third-Party Code defines the minimum level of performance that UPM requires from its suppliers and third-party intermediaries. There are additional requirements for certain materials and services.

UPM Supplier and Third-Party Code is aligned with international standards such as the ten principles of the United Nations Global Compact initiative, the OECD Guidelines for Multinational Enterprises, 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 on the UPM website.

1. Commitment to integrity

The UPM Supplier/Third-Party needs to:

- Comply with all applicable laws and regulations through adequate management systems appropriate to the size and nature of the business.
- 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:

- Treat people (e.g. own employees, employees of contractors and other suppliers, and stakeholders) with dignity.
- Respect universal human rights such as access to clean and healthy environment, freedom of thought, opinion, expression, religion, and freedom from any discrimination based on e.g. race, age, nationality, gender or sexual orientation, political or union affiliation, or freedom from any form of harassment.
- Identify, prevent, and mitigate adverse human rights impacts in its operations and activities.

- Provide adequate wages and respect local laws and applicable industry standards on working time and compensation, freedom of association, and the 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 that special protections are in place for young workers (those below the age of 18 and above legal minimum working age).
- Ensure no form of forced labour (including, but not limited to, modern slavery and human trafficking) is used or tolerated in any of its operations or activities directly or indirectly.
- Ensure the health, safety, and security of its employees, other people working on its sites and premises (e.g. employees of contractors), visitors as well as other people affected by its operations.
- Comply with UPM's safety requirements when working at or visiting UPM sites and complete necessary safety training.
- Ensure that the rights and title to property and land of the individual, indigenous people and local communities are respected.

3. Addressing environmental impact and product safety

The UPM Supplier/Third-Party needs to:

- Identify, prevent and minimise their negative environmental impact on land, water, biodiversity, climate, and air.
- Actively monitor, report, and reduce emissions from its operations and activities to air, water, and soil, including greenhouse gas emissions.
- Ensure that its operations and activities do not cause or contribute to deforestation.
- Use resources efficiently, such as energy or water, and manage any waste according to applicable laws and the manufacturer's instructions.
- Ensure that its products are safe for their intended use and avoid the use of substances of concern.

4. Zero tolerance for corruption and bribery

The UPM Supplier/Third-Party needs to:

- Commit to zero-tolerance for corruption and bribery.
- 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 trading in influence, favoritism, 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.

- Provide UPM with the necessary information to identify and manage risks or potential risks related to human rights violations or environmental harm connected to UPM, enabling UPM to fulfil its due diligence and corporate responsibility reporting obligations.
- Comply fully with applicable tax laws and pay all taxes and other official payments as set by the authorities.
- Comply fully with 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 competitors, 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 and use AI in accordance with applicable laws.
- Implement and maintain appropriate organisational and technical cybersecurity measures to safeguard assets that it needs to fulfil its contractual obligations towards UPM.
- 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.
- Ensure that its suppliers and sub-contractors providing products or services connected to the agreement between the Supplier/Third-Party and UPM comply with this Supplier and Third-Party Code or similar standards.
- 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 engage in meaningful dialogue with them.
- Strive to contribute to the social and economic development of the communities affected by its operations and minimise any negative impacts of its operations on those communities.

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 auditors 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.
- Ensure that its employees, employees of its suppliers (e.g. contractors and sub-contractors), local communities and other affected stakeholders can, without fear of retaliation, have access to adequate grievance and remedial mechanisms, including fair investigation, in the case of concerns about human rights violations, environmental harm, or any other type of misconduct or unethical behaviour.
- 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 or concern, including one concerning UPM employees, can be made via:

Web: www.upm.com/reportmisconduct

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

UPM will carefully review reports of misconduct and keep them strictly confidential to the fullest extent possible. UPM has a policy of non-retaliation against anyone who has reported suspected misconduct in good faith.