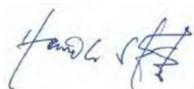


## Holmen's Code of Conduct

The fact that Holmen has a good reputation as a responsible and trustworthy company is fundamental to our business. We want to ensure that Holmen's operations are characterised by responsible behaviour towards employees, shareholders, customers, suppliers, stakeholders, agencies, and the surrounding community. The Code of Conduct applies to all employees of the Holmen Group and compliance with the standards in this code is crucial when choosing who we work with.

Stockholm, August 2019



Henrik Sjölund  
President and Group CEO

### **Business ethics and handling information**

#### **Anti-corruption**

Holmen does not tolerate any form of corruption or fraud.

Holmen's employees must not give, promise, offer, request, or receive compensation or benefits that conflict with applicable laws and good business practice or which may affect or be considered to affect the objectivity of decision-making.

#### **Competition**

Holmen's employees must not be party to any form of agreements, contacts or actions that aim at preventing, restricting, or distorting competition.

Holmen's employees must manage contact with competitors with care and such contact must always be organised in a way that ensures compliance with competition regulations.

### **Marketing**

Holmen's employees must present Holmen's products and services in a way that is correct and fair and follow applicable regulations, statutory requirements, and good industry practice.

Holmen must ensure that its products comply with applicable regulations and statutory requirements, including rules on product safety and labelling.

### **Conflicts of interest**

Holmen's employees must avoid contexts in which their own interests or those of relatives or friends may risk conflicting with what is best for Holmen. Private interests and external activities must not affect, or be considered to affect, the judgement or actions of employees when carrying out their work for Holmen.

### **Holmen's property**

Holmen's property must only be used for Holmen's business. It must not be used for competing purposes or in any other

inappropriate manner that risks damaging Holmen. Holmen's property must not be used for the personal gain of the employee, or that of their relatives or friends. Equipment which Holmen provides to employees remains Holmen's property, and must be looked after accordingly.

## **Insider trading**

Holmen's employees must not trade shares or securities in Holmen when they have information which is not public, and which would be likely to have a significant effect on the share price. Nor must they cause anyone else to conduct such trading.

## **Tax and money laundering**

In countries in which Holmen operates, applicable law and regulations regarding tax and anti-money laundering measures must be complied with. Holmen's employees must not accept, support, or facilitate breach of regulations regarding taxation and money laundering.

## **Financial reporting**

Holmen must regularly publish financial information in line with applicable rules for listed companies. The financial reporting must be correct and complete, comply with applicable legislation, rules and recommendations and provide a fair description of Holmen's operations. Holmen must have functioning processes to ensure that this is the case.

## **Communication**

Holmen's communication must be open, correct, transparent and easily accessible and comply with legal requirements and commercial confidentiality.

All information that affects the share price must be publicised in line with applicable rules issued by stock exchanges and agencies and must only be communicated by specially appointed spokespeople.

Information on Holmen's operations, customers or suppliers may be confidential or protected. Holmen's employees must protect such information from unauthorised use and dissemination.

Holmen's employees are expected to be good representatives of Holmen and must not act or make statements in a manner that could damage Holmen's business or brand.

## **Social engagement**

Holmen is engaged in and expresses opinions on social issues that are important to Holmen's business. Holmen must not participate in party politics or support any political party.

Holmen's employees are free to participate in political activity. It must not be possible to interpret such involvement as being endorsed by Holmen.

## **Human rights and labour rights**

### **Human rights**

Holmen must support and respect protection of internationally recognised human rights, including rights under the UN Convention on the Rights of the Child. Where Holmen identifies a risk that Holmen, through its operations, is contributing towards breach of human rights and children's rights, appropriate action must be taken.

### **Child labour**

Holmen must not use, support, or benefit from child labour.

Holmen must not hire employees under the age of 18 for any form of work that could pose a risk to their health, safety, or well-being.

Holmen must in no case employ hire employees younger than 15 years

## **Forced labour**

Holmen must not use, support, or benefit from any form of forced labour. Employees must be able to move freely during their employment and be free to leave their employment following termination in line with applicable legislation and agreements.

## **Freedom of association**

Holmen must respect the rights of each employee to join, or refuse to join, union or other workers' organisation.

Holmen must acknowledge the employees' elected representatives and negotiate with them in good spirit regarding all important issues in the workplace.

## **Health and safety**

Holmen must provide a healthy and safe working environment. Health and safety work is to take a preventive approach. Risks must be constantly evaluated such that protective measures can be taken. Holmen must provide protective equipment and safety training for carrying out tasks. In the event of process disturbances, priority must be given to work safety rather than production.

Holmen's employees must contribute to their own and their colleagues' healthy and safe working environment, by acting in a safe manner and complying with existing instructions and procedures and also by addressing risks and incidents.

Holmen's employees must not be affected by alcohol or drugs at the workplace.

## **Gender equality, diversity, and equal opportunities**

All decisions concerning employment must be based on relevant and objective criteria such as competence, experience, and performance. Holmen's employees must be treated with dignity and respect. There must be no incidence of discrimination, harassment, abuse, or threats in the workplace.

Holmen's employees must have fair and equal development opportunities irrespective of their sex, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union membership, social background, health status or family responsibilities.

## **Pay, working hours and other terms of employment**

Holmen must pay a market wage. Minimum wage requirements, statutory or contractual, must be complied with. Wages must be paid regularly. Holmen's employees must have the right to paid overtime, annual leave, sick leave, and parental leave, in line with applicable legislation and agreements.

Holmen's employees must have a written, comprehensible, and legally binding contract of employment. Holmen must comply with applicable legislation, agreements, and industry standards regarding working hours.

Holmen must respect employees' privacy and handle personal data in confidence and in line with applicable legislation.

## **Environment**

### **Renewable raw material and energy**

Holmen's business is based on wood fibre, a natural, renewable material that is neutral in terms of the climate. The aim is to increase production of renewable energy in the form of hydro power, wind power and bioenergy and Holmen must work to ensure efficient use and production of raw materials and energy.

### **Responsible production**

In its business Holmen must apply the precautionary principle, so as to prevent, hinder or combat damage or detriment to human health and the environment. In the event of process disturbances, priority must be given to environmental

considerations rather than production. The environmental impact of current as well as discontinued operations must be acceptable to individuals and the environment.

Activities must be characterised by a holistic approach in which Holmen's forests, watercourses, processes, and products are part of a natural cycle. When developing products and making investments, profitable production must be combined with efficient use of resources and consideration for the environment. Efforts must be determined by what is technically possible, economically feasible, and justifiable in environmental and energy terms.

Holmen's mills for sawn timber, paperboard and paper must have ISO-certified management systems for environment, energy, quality and working environment. Holmen's forestry operations must have ISO-certified management for environment.

## **Sustainable forestry**

Holmen's forestry must be run with the aim of achieving high-volume and sustainable production of forest raw material. The forests must be managed responsibly in a way that ensures the long-term survival of native plants and animals in the forest landscape and the protection of biodiversity.

## **Environmental considerations in purchasing**

Holmen must require that suppliers of products and services, logistic services, wood, and electricity take energy and environmental aspects into account in their business activities.

All wood must be traceable back to its origin.

## **General**

Holmen works to contribute to the achievement of UN's 17 Global Goals for Sustainable Development. Holmen support the ten principles of the UN Global Compact, the eight fundamental conventions of the International Labour Organization (ILO) and OECD's guidelines for multinational companies. The Code of Conduct is based on these principles and provides guidance in day-to-day work, clarifying what each employee can expect of their colleagues.

Holmen's employees must comply with all applicable legislation and if the provisions of the Code of Conduct are incompatible with legislation, applicable law and regulations take precedence.

The Code of Conduct is a wide-ranging but not exhaustive document. Holmen's policies together with guidelines and instructions provide further guidance on how the different areas are to be handled. Every employee is personally responsible for understanding and acting in accordance with the Code of Conduct and Holmen's policy documents. The Code of Conduct is available on Holmen's intranet and website. All managers are responsible for ensuring that their employees are familiar with the Code.

Holmen expects that employees and other stakeholders who suspect a breach of the Code of Conduct will report this. An employee who wishes to report such a suspicion can contact their superior manager or another manager at Holmen.

There is the option for employees and other stakeholders to use Holmen's whistleblower function on [www.holmen.com](http://www.holmen.com). Holmen does not tolerate any form of reprisals against any reports made in good faith.