



sappi

Sappi  
Code of Ethics

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# Message from the CEO

**Sappi's purpose is to build a thriving world by unlocking the power of renewable resources to benefit people, communities, and the planet. We do this as a leading global provider of powerful everyday materials made from woodfibre-based renewable resources. We are moving quickly toward a more circular economy with our partners.**

Thrive25 defines our business strategy, commitment to sustainability and innovation, financial targets, and values. The power of OneSappi sets our commitment to work as a unified global team to achieve our departmental, divisional, regional and global goals.

While our purpose and business strategy set out why we exist and what we want to achieve, our Values and Code of Ethics guide how we will achieve our goals.

We are a global company operating in many different countries and jurisdictions. Presenting a coherent and consistent Sappi to our staff, customers and other stakeholders, and ensuring that we behave ethically, is more critical than ever. In line with our strategy and commitment to being a responsible corporate citizen, we have updated our Code of Ethics.

Although we recognise our stakeholders already operate to high ethical standards, there are differences between regions and countries, which are not static but change over time. As OneSappi, our aim is that all our stakeholders should clearly understand the principles that should inform their decisions and actions and how they should conduct themselves. The Code applies to all our stakeholders, from board members to our newest employees.

The Code is central to our reputation, which lies at the heart of our success. We need to ensure that everything we do builds and protects that reputation. By behaving under the Code, we create a supportive, positive atmosphere that builds morale and enhances our reputation.

Our goal of driving Sappi as a growing and profitable, diversified woodfibre group depends on our ongoing commitment to responsible business principles. How we do business is never a short-term consideration but should contribute to our long-term sustainability. For our Code of Ethics to be effective each day, we must live our core values of doing business safely with integrity and courage; making smart decisions, which we execute with speed.

Our commitment to acting as responsible corporate citizens aligned with the United Nations Global Compact includes specific compliance with all laws and regulations in the countries and jurisdictions where Sappi operates. Key topics to be aware of are summarised as part of our Code.

Just as you have wholeheartedly embraced Thrive25, I ask you to embrace the Code of Ethics, engage with the



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reputation,  
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the heart of  
our success.”

awareness and training programmes, keep abreast of any changes in Sappi policies and behave in a manner which advances our reputation.

Thank you

Steve Binnie  
Chief Executive Officer, Sappi Limited

# How we behave

As a foundation, we obey the laws of all the countries and jurisdictions where we conduct business.

Every person should be thoughtful, considerate of others, use common sense, and act according to our value statement.

“As OneSappi, we do business safely, with integrity and courage, making smart decisions that we execute with speed.”

The following values should guide all our decisions and actions:

## Safety

- Foster a safety-first culture.
- Never compromise the wellbeing of our employees or stakeholders.
- Serve our customers and communities.

## Integrity and courage

- Act with compassion.
- Expect excellence in ourselves and of others.
- Be open and honest.
- Embrace change.

## Smart decisions

- Show entrepreneurial spirit.
- Understand our customers and their needs.
- Use collaboration and the power of partnerships.

## Execute with speed

- Work with energy and passion.
- Embrace new thinking and new technologies.
- Balance effectiveness with efficiency.

**Always strive to improve the reputation of Sappi through your positive actions and avoid any activity that could lower Sappi's reputation by:**

- Familiarising yourself with the Code, knowing what it means and what is expected of you
- Communicating to our business partners (suppliers, contractors and customers) that we expect them to familiarise themselves with the Code of Ethics and abide by its principles
- Reporting breaches of the Code of Ethics, and
- Avoiding harassment, bullying, racism and discrimination, thereby protecting all our fundamental human rights.

# Application and enforcement of the Code of Ethics (Code)

The Code applies to all of Sappi's board of directors, officers and employees. Violations of this Code will lead to disciplinary action under Sappi's disciplinary procedures. The outcome of disciplinary action may involve summary dismissal or criminal prosecution.

In addition to our employees, our Code and our approach to responsible business practices will be promoted to our suppliers, contractors, stakeholders and customers. We need them to understand how we will do business with them and how we expect them to do business with us. Suppose we encounter a supplier, contractor, customer or another stakeholder who refuses to embrace the principles and values reflected in the Code. In that case, we will carefully evaluate whether we can maintain a relationship with that party. We created a guideline on stakeholder commitment to responsible business practices to assist in managing such situations.

In case of uncertainty on appropriate behaviour, you should approach your line manager, your Legal Department or the Internal Audit Department. Alternatively, send an email to [Ethics@sappi.com](mailto:Ethics@sappi.com).

All relevant policies are available on either Sappi Net at <http://sappinet.za.sappi.com/policies> (for employees) or our website at <http://www.sappi.com/policies>.

Our Group Supplier Code of Conduct is available at <http://www.sappi.com/suppliercodeofconduct>

## Links to global training resources

Link to training from inside the Sappi network:  
<https://sappi.csod.com/samldefault.aspx>

Link to training from outside the Sappi network:  
<https://sappi.csod.com>





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We support open communication and encourage discussions with managers to identify unethical behaviour.”



# Reporting and whistle-blowing

We support open communication and encourage discussions with managers to identify unethical behaviour.

If you suspect or believe you have observed unethical or illegal conduct, you should notify your line manager promptly.

If you feel uncomfortable bringing an allegation of unethical or illegal conduct to your line manager's attention, there are others in management you could approach. Every Sappi manager is available to receive such reports and will ensure the appropriate action. You may also report incidences of unethical conduct to either the Human Resources-, Legal Services- or Internal Audit Departments in person or writing.

Should you feel that there has not been an appropriate response to the unethical behaviour you've reported, you can email [Ethics@sappi.com](mailto:Ethics@sappi.com) or contact the confidential, independently operated Sappi Hotline. The dial-in details per country are listed below:

## Call the Sappi Hotline

### Sappi Southern Africa

South Africa: 0800 98 3612

### Sappi Europe

Austria: 0800 281 119

Belgium: 0800 26 039

Finland: 0800 07 635

Germany: 0800 181 2396

Italy: 800 727 406

The Netherlands: 0800 022 0441

Poland: 00800 111 3819

United Kingdom: 0808 189 1053

### Sappi Europe sales offices

France: 0805 080 339

Hungary: 212 111 440

Russia: 8800 100 9615

Spain: 900 905 460

Switzerland: 0800 838 835

Ukraine: 0800 501 134

### Sappi North America

Canada: 1800 235 6302

USA: 1800 461 9330

### Sappi Trading

Hong Kong: 800 906 069

Mexico: 800 681 6945

### or file a report online

[www.convercent.com/report](http://www.convercent.com/report)

### No retaliation

Our Group Whistle-blowing Policy, available on our website [here](#), protects whistle-blowers. Please note that Sappi will not accept or tolerate any retaliation against any colleague who reports a violation of the Law or the Code of Ethics. Knowingly misreporting a violation may result in disciplinary action.

**Do the right thing.  
Report your concerns.**



# Human rights

Our Group Human Rights Policy clearly states Sappi's position on human rights. Human rights are generally defined as basic standards of treatment to which all people are entitled, regardless of nationality, gender, race, sexual orientation, economic status or religion.

We commit to the United Nations Global Compact principles, the Universal Declaration of Human Rights, and the International Labour Organisation.

- **Employees:** We treat our employees with dignity and respect and promote diversity in the workplace.
- **Communities:** We engage with communities to build our understanding of potential human rights issues to enhance the benefits of our projects and operations and manage potential impacts.
- **Suppliers:** We encourage our suppliers to treat their employees and to interact with communities in a manner that respects human rights.

## Expected behaviour

- We expect all Sappi employees to treat with the utmost respect and dignity other employees and all stakeholders with whom they interact.
- We respect diversity and promote an inclusive environment that fully helps all employees participate and contribute to Sappi's success.
- We provide equal employment opportunities and treat applicants and employees without bias.
- We do not discriminate against anyone at Sappi based on race, religion, colour, age, gender identity or expression, or sexual orientation.
- Workplace harassment, bullying, intimidation, or actual or threatened violence are prohibited.
- The use of child-, compulsory- or forced labour is prohibited.





## Practical examples

Q

Harry constantly makes personal comments to Mary about her appearance in a way that makes Mary feel embarrassed and uncomfortable. It has reached the point where Mary dreads coming to work. What should she do?

A

Mary should report the situation to a manager she feels comfortable with or someone in the Human Resources Department. Harry's behaviour is intimidating and offending Mary and may constitute harassment.

Q

Dick applied for a promotion. Although Dick's qualifications and experience were better than those of the other applicants, he did not get the job, and another candidate was appointed. Dick feels discriminated against, or maybe nepotism played a role in the appointment. What should he do?

A

Dick should report the concern to the Human Resources Department and follow the relevant processes like the Grievance Procedure.

Q

Frank overheard a colleague calling someone a name with racist overtones. What should he do about it?

A

If Frank is comfortable doing so, he should speak with the colleague and try to sensitise him to the impact of his words. Should the disrespectful treatment continue, Frank should discuss the matter with his supervisor or the Human Resources Department.

### Where can I find further information?

- Read the [Sappi Group Human Rights Policy](#).
- Read the [Sappi Group Human Resources Policy](#).



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All employees at Sappi are to treat other employees and all stakeholders with whom they interact with the utmost respect and dignity.”



# Health, safety and a sustainable environment

Protecting people and the environment underpins our approach to sustainability. We place the highest priority on the health and safety of our workforce and preserving the environment.

One of our main inputs is woodfibre, a natural resource which depends on healthy ecosystems. Accordingly, we promote sustainable forestry through internationally accredited, independent environmental management and forest certification systems. In our operations, by focusing on cleaner, more efficient manufacturing and increased waste reuse and beneficiation processes, we can earn more income and produce more with less – an approach which has obvious environmental and economic benefits.

## Expected behaviour – we must:

- Keep up-to-date on laws, regulations and practices related to safety and the environment that are relevant to our business.
- Report safety and environmental concerns or issues through the appropriate company channels.
- Strive to minimise our environmental impact in ways that are relevant to our business and important to the communities we serve, as set out in our Group Environmental Policy and Group Sustainability Charter.
- Develop reuse and beneficiation processes throughout our operations.
- Take all reasonable measures to maintain a safe and healthy operating and working environment and to prevent workplace accidents and injuries.

## Practical examples

Obed's supervisor asks him to perform a task that Obed believes violates environmental regulations. What should Obed do?

**A** Obed should check with his supervisor to ensure he understood the request and then explain his concerns. If Obed still feels that the request violates environmental regulations, he should report the matter to local or regional management or the Sappi Hotline.

Matthew's unit has a safety bonus plan based on its safety performance. He knows that (some) injuries are not being reported. What should Matthew do?

**A** Investigating injury-producing accidents (and near misses) is imperative to determine the actions necessary to prevent similar occurrences. Employees should always notify their supervisor when an accident occurs in the workplace. If a colleague or supervisor is reluctant to report or record a work-related injury, Matthew should encourage them to report it. Matthew should contact the local safety officer, management, or the Sappi Hotline if the injury is not reported.

### Where can I find further information?

- Read the [Sappi Group Occupational Health & Safety and Product Safety Policy](#).
- Read the [Sappi Group Sustainability Charter](#).
- Consult the [Sappi Group Environmental Policy](#) or [Sappi Group Climate Change Policy](#) available on Sappi Net (<http://sappinet.za.sappi.com/policies>) for employees, or on our website (<http://www.sappi.com/policies>).
- Speak to the local or regional safety officer.
- Speak to your mill or regional environmental manager.



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Our commitment to sustainability underpins our strategy and is based on being a trusted, transparent, and innovative partner in building a biobased circular economy.

We invest and search for innovative ways to leave the planet better than we found.

We make purpose-driven and meaningful contributions to our employees' and communities' well-being and development.”



# Preventing fraud and corruption

Preventing fraud and corruption is not only a moral issue; it's also about doing good business. Bribery and corruption significantly reduce our ability to produce positive economic and social outcomes and affect Sappi's long-term viability. We will observe all applicable laws and regulations, such as the Foreign Corrupt Practices Act in the USA, UK Bribery Act in the United Kingdom, and other similar acts worldwide. We do this to maintain the highest possible standards in our accounting and financial procedures and statements.

At Sappi, we expect our stakeholders to act in the company's best interests and with a high standard of ethics. Our business decisions should be made free of conflict of interest and impartial in appearance and fact. We must make decisions based on sound business reasoning in line with our value of 'making smart decisions'. Conflicts of interest may occur when an individual's outside activities or personal interests conflict or appear to conflict with their responsibilities to Sappi. Activity outside the company can be considered a conflict of interest if it:

- Harms our business interests
- Negatively affects Sappi's reputation or relations with others, or
- Interferes with an individual's judgment in carrying out their job duties.

## Expected behaviour

- We win business based on our outstanding products and services, rather than through the provision or acceptance of extravagant gifts or entertainment. There might be times during the course of your work when not accepting gifts or entertainment could cause offence. The question you need to ask yourself is "*Could a reasonable person think the gift, entertainment or favour might influence your business judgment?*" If the answer is "Yes," you must refuse it.
- Accurately record all your transactions and any gifts or entertainment you receive/provide using the disclosure channels provided in your region.
- It's important to maintain objectivity when dealing with customers and suppliers and to ensure that your decision is not influenced by gifts, entertainment or favours that could:
  - Create a sense of obligation towards the customer/supplier
  - Prejudice Sappi's interests in favour of your own
  - Compromise your independence, or
  - Negatively influence your ability to pursue Sappi's best interests.
- You should report all actual or attempted instances of bribery and corruption of which you become aware.
- Any activity that has the appearance of a conflict of interest – whether or not an actual conflict exists – should be avoided.
- Declare and discuss any potential conflicts of interest with your manager and take the appropriate action.
- Never use your company position or influence to secure an improper benefit for yourself or others.

## Practical examples

Jo's father's company is trying to become a supplier of Sappi. As Jo works for Sappi does this create a conflict of interest?

**A** If Jo has decision-making authority and is responsible for requisitioning, purchasing or accepting work, a conflict of interest exists. Even if Jo does not have such control, this relationship may appear to be a conflict of interest. Jo should report the situation to her manager using the company's standard declaration protocols. Jo should also remove herself from the decision-making processes involving her father's company.

Anna's colleague Pat is a line operator who is responsible for conducting regular checks on product quality. Anna learns that Pat has not been conducting the required tests and has been falsifying his documentation. Should Anna notify her supervisor?

**A** Yes, Anna should notify management immediately. Sappi's reputation depends on the quality of our products.

In Zack's area, it is both typical and expected for suppliers to provide their clients with fairly expensive and lavish gifts. Because of this custom, Zack is finding it difficult to discourage our suppliers from providing these gifts. What should Zack do?

**A** Zack should politely advise these suppliers that Sappi's Code of Ethics does not permit our employees to accept these gifts. Procurement Departments should look for opportunities to notify suppliers of these standards before problems arise at the beginning of the relationship or before the holiday gift-giving period.

Thabo has developed a friendship with a supplier and is considering entering into a partnership with her in a business venture unrelated to Sappi's business. Does this create a conflict of interest?

**A** Yes, it could. Even if Thabo can keep his personal and financial dealings with his friend from affecting his judgement on behalf of Sappi, others may perceive that Thabo is biased. Before Thabo takes any action, he should disclose and obtain approval for these plans through the normal disclosure channels. He should also consider the general Sappi rules regarding being involved in other work as a full-time employee.

## Practical examples (continued)

Q

Ruth, a Sappi employee is also a director of a hair salon. Is Ruth obliged to declare this?

A

Yes, employees must disclose to Sappi if they are company directors.

### Where can I find further information?

- Read the [Sappi Group Prevention of Fraud and Corruption Policy](#).
- Call the Sappi Hotline in your region if you suspect corrupt behaviour.
- Alternatively, speak to your line manager, your regional legal representative or your regional internal auditor.





# Insider trading

The definition of insider trading is buying or selling shares or advising others to buy or sell shares based on material, non-public information. This type of trading takes unfair advantage of privileged information, putting the average investor at a disadvantage and violating the market principle of transparency.

Information is considered publicly available (or in the public domain) only when it has been released (to the public) through appropriate channels (such as a company press release or public stock exchange filings). In addition, the investing public must have sufficient time to absorb and evaluate the impact.

## Expected behaviour

- Do not trade in Sappi shares during closed periods and do not ask others to trade on your behalf.
- If you are a director (or on the lead teams of Sappi Limited or any subsidiaries and operating companies) ensure that any trade in Sappi shares is made known to the Group Company Secretary.
- Do not share any confidential or proprietary information such as information about unpublished financial results, new products, and acquisition plans or strategies that have not yet been made public to third parties. This principle also applies to family members and relatives.
- Be careful to not create the impression that you are giving investment advice when explaining Sappi's performance or financial results to anyone.

## Practical examples

Sam has access to actual quarterly financial results. Can she tell friends or family of the positive or negative quarter Sappi just had?

**A** No, not before the results are published through the Johannesburg Securities Exchange, where Sappi's shares are publicly listed. Until then, the results are confidential. Suppose Sam's family or friends trade in Sappi shares before the financial results become public (and they did so based on information or comments they received from her). In that case, they will be violating insider trading legislation.

Adam would like to help a local charity boost their investment portfolio. Adam has knowledge of a new Sappi innovation that will most likely boost our share price. Can Adam give a tip to the charity?

**A** No, although Adam has good intentions, he cannot share this material non-public information. If Adam does so, and the charity buys shares based on this information, Adam and the charity may be liable for violating insider trading legislation (as per the previous example).

## Where can I find further information?

- Read the [Sappi Group Trades in Sappi Limited Securities Policy](#).
- Read the [Sappi Group Investor Relations Policy](#).
- Please contact the Group Company Secretary on +27 (0)11 407 8072 or the Group Head Investor Relations and Sustainability on +27 (0)11 407 8391.



# Competition law

Fair competition is an essential element in the efficient working of markets, and it brings significant benefits to the economy by encouraging enterprise, innovation, efficiency and expanding choice. Antitrust laws – called 'competition laws' – protect consumers and companies from collusion by ensuring fair competition exists in an open market economy.

The consequences to Sappi for non-compliance with antitrust laws are significant, and non-compliance results in severe financial fines, reputational harm, private damage claims and potentially criminal penalties being imposed on company employees. Potential infringements of antitrust laws are the single most important legal risk for Sappi.

## Expected behaviour

Do not join Sappi's competitors or business partners in agreements or understandings that limit competition. These might include:

- Fixing prices (this include the actual price or any increases or any charges related to the product)
- Joint establishment of discounts/rebates, or
- Dividing product markets, territories or customers, for example, *"We'll stay out of your market if you stay out of ours."*

Industry meetings are usually arranged so as to avoid any allegations of parties meeting to collude and agree on anticompetitive behaviour. However, care should always be taken in any meeting that includes industry players. You should report any attempted or actual anticompetitive behaviour to your regional Legal Department.





## Practical examples

**Q** Mary's friend Ron works for one of Sappi's competitors. Ron mentions that his company is planning pricing increases and implies that if Mary could get Sappi to increase its prices for a certain range of product, Ron's company would do the same. What should Mary do?

**A** Mary should tell Ron that this discussion could be perceived to be price-fixing and that she cannot engage further on this matter. Price-fixing is illegal and can have severe consequences for the companies involved, and Mary should promptly report the conversation to her Legal Department.

**Q** John, who works for Sappi, is approached by Penny, who works for a competitor. Penny asks John whether Sappi intends to put in an offer for tenders issued by two particular clients and suggests that John should put in a higher offer than Penny for customer A in order for Penny to get customer A's contract and she will put in a higher offer than John for customer B in order for John to get customer B's contract. What should John do?

**A** John should tell Penny that this discussion could be perceived as collusive tendering or customer allocation and that both companies could be breaking the Law and refuse to enter into any such agreement. John should also report the conversation to his Legal Department.

**Q** Tim is in the purchasing department and has been purchasing caustic soda at an exorbitant price, affecting Sappi's market share. During an industrial conference Susan from a competing firm mentions that if Tim and her firm coordinate purchases, they will be able to get discounts from the suppliers. Should Tim accept?

**A** No, coordinated purchases are anti-competitive and therefore prohibited. Tim should explain to Susan that this would be wrong as it is aimed at stifling competition. Tim should report the conversation to the Legal Department.

### Where can I find further information?

- Read the [Sappi Group Competition Law Policy](#).
- Consult the Legal Department in your region.



# Political affairs, sensitive payments and donations

In doing business around the world, Sappi regularly interacts with government officials. How we conduct ourselves with governments and in the political arena can affect our reputation, our operations worldwide and our ability to work with government officials and other stakeholders. Many of these officials and stakeholders are responsible for issuing licences for our operating units or regulating our activities. In all instances, employees must seek proper guidance and obtain the required approvals before embarking on government or political stakeholder engagement activities on behalf of Sappi.

Sappi does not seek to influence public decisions unduly. In line with our policy of non-discrimination and inclusivity, we cannot single out and support specific political or religious groups.

No political contributions of the funds of Sappi Limited or any of our subsidiaries are to be made, directly or indirectly, to candidates for political office or political parties or committees in any country.

Bribery of any government official in any country is strictly against Sappi policy, even if the refusal to make such a payment would result in our losing a business opportunity. Sappi employees (and business partners engaged in Sappi business) are not allowed to make payments or provide anything of value to government officials with the intent to improperly influence the performance of their official duties or gain any other improper advantage.

## Expected behaviour

- Do not contribute Sappi resources to any political or religious groups.
- Employees may not engage in personal political activities during paid working hours or when using company resources (such as email, telephone and meeting rooms) without receiving pre-approval from their direct managers.
- Obtain approval before giving any gifts (directly or indirectly) to government officials their employees and customers.



## Practical examples

Q

Karen works in logistics. Border officials can misuse their position to delay shipments or impose unwarranted penalties. Karen knows that in order to avoid this and expedite the process she can make modest expediting payments to these government officials. Can Karen make such payments?

A

No, such 'facilitation' payments would likely violate local and other antibribery and corruption laws.

Q

Zara uses her Sappi email account to solicit votes for her husband who is running for local political office. Is this acceptable?

A

No, it's not permissible to use company resources for political purposes.

Q

Sipho is a marketing director and recently learned about an agent who can assist Sappi in obtaining business in a country where it has been difficult for us to become established and to obtain the necessary local government permits and licences. Can Sipho engage this agent on behalf of Sappi?

A

Before Sipho engages the agent, he must undertake proper due diligence to ensure that the agent is reputable and that its business methods align with local and relevant global legislation. He must first make appropriate contractual arrangements and implement monitoring processes. This approach is critical because Sappi could be liable for the third party's acts.

Q

A faith-based group is fundraising money for victims of a natural disaster who are helped irrespective of their religion. Franco knows that Sappi does not contribute to political or religious groups. Can an exception be made in this case?

A

Yes, in this instance, Sappi might consider donating money to the disaster relief fund because the fund will not be targeting a specific religious group and the purpose of the fund is disaster relief.

### Where can I find further information?

- Read the [Sappi Group Prevention of Fraud and Corruption Policy](#).
- Read the [Sappi Group Stakeholder Engagement Policy](#).
- Read the [Sappi Group Corporate Citizenship Policy](#).
- Consult the Legal Department in your region.
- Contact the Group Head Corporate Affairs on +27 (0)11 407 8044.



# Use of company assets, people, resources and time

Sappi's assets, from computers and machines to intellectual property such as a patent or trade mark, are essential tools for our success. Misusing these assets could negatively impact our business or our reputation. We must be good stewards of the assets we use daily and accept personal responsibility for properly using the company assets in our care.

## Expected behaviour

We should all:

- Use assets such as company vehicles and computers properly (with care and respect) and legally, for company purposes, and (where applicable) for authorised personal use
- Comply with company policies, including IT and communication policies (such as electronic communications; media; social media)
- Work according to the highest standards of service and delivery
- Ensure the effective and efficient use of company time – time for which we are considered to be at work and for which we are being paid
- Complete tasks and projects cost-efficiently and in the shortest reasonable time frames, and
- Continuously seek better and more efficient and effective ways of performing our work.

## Practical examples

Q

Hannes uses a company laptop computer when travelling. What precautions should Hannes take?

A

Apart from the asset's value, laptop computers may contain confidential company information. Hannes must ensure the safekeeping of the laptop at all times, thereby protecting the content.

Q

Whenever Marie needs to find her colleague Mike to go over a work project, Marie finds Mike on a smoke/ coffee/Internet leisure break. It seems like Mike takes many such breaks a day. What should Marie do?

A

We must use our time at work to focus primarily on Sappi business. Mike is not respecting Sappi's policies on the effective use of time and working hours. If such breaks are excessive and leisurely, such behaviour is inappropriate and undermines morale. Marie should address her concerns with her colleague (if she is comfortable doing so), her manager, or the Human Resources Department.

## Practical examples (continued)

Roger has been taking annual leave without submitting a request in the system and sometimes takes sick leaves when he is not sick. Is this justified?

**A** No, Roger should submit a leave request on the system each time he takes leave because not doing so means it will not be on record in the system. He should also not take sick leave when he is not ill, as not recording leave and taking unjustified sick leave is tantamount to stealing time.

Jenny uses her company computer for online banking. Is this appropriate?

**A** Yes, employees can use the Internet for appropriate personal tasks if the activity is infrequent or insubstantial and does not interfere with an employee's job performance.

### Where can I find further information?

- Read the [Sappi Group Classification and Management of Electronic Information Policy](#).
- Read the regional human resources policies relating to the applicable topic.
- Consult the various policies on the Sappi Net (including the [Sappi Group Media Engagement Policy](#) and [Sappi Group Social Media Policy](#) as well as the [Sappi Group Internet Usage Policy](#) and the [Sappi brand and corporate identity guidelines](#)).
- Speak to your line manager, Human Resources- or Legal Department.





# Privacy and confidentiality

Sappi's information assets include our records, systems and intellectual property, for example, trade secrets and patents. Like most companies, Sappi keeps sensitive personal information in its files – names, passports, social security numbers and other account data that identifies our employees and customers. We are responsible for safeguarding our information assets and discerning when handling sensitive or proprietary information.

Personal data is information that can directly or indirectly identify an individual, including employees, contractors, directors, shareholders, customers and anyone else with whom Sappi does business. The proper protection and use of personal data demonstrate respect and promote trust. Suppose personal and sensitive information falls into the wrong hands. In that case, it can lead to fraud, identity theft or similar given the cost of a security breach – losing employees' and customers' trust and perhaps even defending ourselves against a lawsuit, safeguarding personal information makes good business sense.

Trust is an essential element of relationships, and our relationships with a broad range of stakeholders depend on building and retaining that trust. In the countries where we operate, there are laws governing how we collect, use and dispose of personal data.

## Expected behaviour

- We adhere to all applicable regional data governance legislation to keep our confidential and sensitive information secure, including the GDPR in Europe and POPIA in South Africa.
- We respect the confidentiality of personal data. This information may not be used or disclosed improperly or used by someone who is not authorised to do so.
- We safeguard Sappi's information assets and intellectual property against theft, unauthorised disclosure, or misuse.
- We use personal, supplier and customer data only to support our operations and to provide employee benefits and customer solutions.
- We have safeguards to protect personal and customer data and we expect all our employees and anyone else with access to this data to comply with these safeguards.
- We inform individuals about the collection and processing of their data, as well as their rights towards their personal data.
- We comply with all regulations and contractual commitments regarding the valid and enforceable intellectual property rights of third parties, including patents, copyrights, trade secrets and other proprietary information.

## Practical examples

**Q** Ella's friend who works for another company asked Ella to provide her with the contact details of some business contacts. Ella's friend's company does not compete with Sappi. Is it acceptable for Ella to give her the requested information?

**A** Business contact information is considered personal data because it can identify an individual, and personal data may not be shared with anyone except as required or with the individual's permission. Suppose Ella believes her business contacts could benefit from the introduction to Ella's friend's company. In that case, she can ask her business contact if they are comfortable with Ella sharing their contact information, or she can pass along her friend's company information to her business contact.

## Practical examples (continued)

Q

Carol has piles of personal information relating to certain Sappi employees on her desk in full view of passers-by. She needs easy access to these documents and information as part of her Sappi duties. Is this acceptable?

A

If Carol has a legitimate business need for the personal information of Sappi employees, she may keep it. For the relevant retention period, sensitive and confidential information must be kept in a secure physical or electronic filing system.

Q

Nompu has been contacted by a journalist requesting information about the most recent financial results. Nompu has heard that the results are excellent and, knowing that the news will likely boost Sappi's share price, believes that she would be helping Sappi by passing on what she has heard. Should Nompu speak to the journalist?

A

No, Nompu should refer the journalist to the Regional Communications Manager, the Group Corporate Affairs- or the Group Investor Relations Departments. Nompu must not divulge what she has heard to the journalist. The information Nompu possesses may be incorrect or incomplete. Even if the information is correct, sharing it with the journalist may be inappropriate at the time and harmful to Sappi.

Q

Frederique has set up his personal mobile device so that he can check his Sappi email, calendar and contacts on it. Can Frederique disable the mobile passcode?

A

No, disabling the mobile device passcode will compromise the mobile device's security and may expose Sappi's email to others who should not have access to it.

Q

Karl overheard other Sappi employees discussing Sappi business at the gym. What should he do?

A

If Karl believes that the information being discussed is sensitive or confidential, he should advise the parties that they can be overheard. Every employee is responsible for ensuring that confidential and proprietary information is not publicly disclosed.

### Where can I find further information?

- Read the [Sappi Group Social Media Policy](#).
- Consult the Communications Department in your region.



# Personal conduct on social media

## Communication

Sappi's Group Social Media Policy will be updated regularly to ensure that the company's interests and reputation are protected, considering the fast-paced development in this area.

Social media platforms are no different to any other form of communication, and the same due care and diligence must be taken when using them. What distinguishes social media from other communication platforms is that it is instant and can quickly reach a vast audience. Therefore, the consequences of a mistake or ill-considered remark have the potential for more significant (and quicker) damage to the individual and the company's brand and reputation than other forms of communication. It is also challenging to remove such social media comments or posts or prevent their distribution even after deletion.

Even when communicating in your capacity, you should consider the possible consequences of statements or comments which can offend.

### Expected behaviour

- Refrain from excessive use of social media during work time or on company equipment unless it is work-related as authorised by the relevant policy.
- Internet postings may not include Sappi's logos or trade marks and must comply with copyright, privacy, fair use, financial disclosure and other applicable laws.
- Be smart about protecting yourself, your and others' privacy, and Sappi's company profile and reputation.
- The Internet is not anonymous, nor does it forget. What you publish on social media sites is widely accessible and likely to be available for a long time. Please consider the content carefully before posting material on the Internet.





## Practical examples

Leola was using her own computer and came across a blog where confidential Sappi information was been divulged. What should she do?

**A** Such disclosure of confidential information is strictly forbidden. Discuss your observation with your manager and notify the Group Corporate Affairs Department.

Chan regularly visits his personal social media accounts whilst at work. Is this appropriate?

**A** No, unless Chan is expressly authorised to visit his social media accounts as part of his job responsibilities, it is inappropriate for him to spend time chatting and posting on these platforms using Sappi computers during working hours. If he wishes to chat on social media, he should do so using his personal computer and in his own time.

Gerald posted a racist comment on his private Facebook account using his private phone. Will this comment affect Sappi in anyway if the comment did not involve a Sappi stakeholder?

**A** Posting a racist comment is unethical and contrary to Sappi's values. This comment will damage Sappi's reputation even though it did not involve a Sappi stakeholder, and Gerald posted it to his private Facebook account using his device.

### Where can I find further information?

- Read the [Sappi Group Social Media Policy](#).
- Read the [Sappi Group Human Resources Policy](#).
- Consult the Communications Department in your region.



# We comply with international trade laws

Free and fair trade allows companies to expand markets and do business globally, thereby adding value to stakeholders. As a global company, Sappi provides dissolving pulp, packaging and speciality papers, graphic papers, biomaterials and biochemicals to our direct and indirect customer base across more than 150 countries. Our ability to do so depends on compliance with the laws and regulations associated with cross-border trade.

## Expected behaviour – we must:

Follow and comply with the trade laws of countries where we conduct business, including legislation and international resolutions concerning:

- Importing or exporting specific goods, services or technology
- Prohibiting transactions with specific countries, entities or people (for example United Nations sanctions)
- Government approval, licences or other requirements necessary to complete a transaction or sale, or
- Product labelling.

Understand which countries or people we may not do business with because of sanctions or other restrictions.

Engage companies and business partners who agree to obey international trade laws.

## Practical examples

Q

Morgan works in sales and was recently contacted by a foreign company that wishes to buy Sappi products. The prospective customer is headquartered in a country in which Sappi has never done business. What should she do?

A

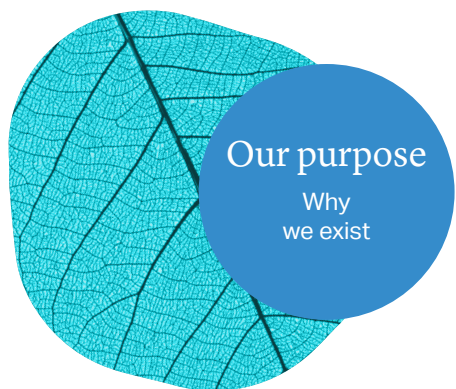
Before entering any business with the prospective customer, Morgan should do his due diligence to ensure that Sappi will not be doing business with a country or organisation subject to any legally imposed sanctions.

### Where can I find further information?

If you have questions or concerns about international trade laws, talk to a representative from the Legal Department in your region.

All relevant policies can be found on either Sappi Net at <http://sappinet.za.sappi.com/policies> (for employees) or on our website at <http://www.sappi.com/policies>.

Sappi uses a SAP Global Trade Services (GTS) module, which is a sanctions screening system to check for individuals and entities that are sanctioned.



## Our purpose

Why we exist

Sappi exists to build a thriving world by unlocking the power of renewable resources to benefit people, communities, and the planet.

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## Our vision

What we're striving to achieve

We will be a sustainable business with an exciting future in woodfibre that provides relevant solutions, delivers enhanced value, and is a trusted partner to all our stakeholders.

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## Our values

How we do business

As OneSappi, we do business safely, with integrity and courage, making smart decisions that we execute with speed.

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## Our business strategy

How we'll get there

Through collaboration and innovation, we will grow profitably, using our strength as a sustainable and diversified global woodfibre group focused on dissolving pulp, graphic, packaging and speciality papers, and biomaterials.

Our strategy demands a clear focus on four key fundamentals

- Grow our business
  - Drive operational excellence
  - Sustain our financial health, and
  - Enhance trust
- 



## Our sustainability strategy

How sustainability will drive value

Our commitment to sustainability is based on being a trusted, transparent, and innovative partner in building a biobased circular economy.

sappi

