

SCA Code of Conduct



Code of Conduct

Dear colleague,

SCA operates in many different contexts, both large and small. We have both a local and an international presence. We are colleagues, managers and board members. Our actions and conduct have an impact on nature, the environment, people and communities. Therefore, it is important that we pursue our business responsibly, and in compliance with laws and regulations.

The Code of Conduct is a guide for all of us. Not only is it a practical manual to help us make the right decisions in everyday situations, it also provides a clear framework of our core values – responsibility, respect and excellence – and is our foremost steering document in the sustainability field. The Code of Conduct is based on the UN Declaration of Human Rights, the International Labour Organization (ILO) Core Conventions, the OECD Guidelines for Multinational Enterprises, and the ten principles of the UN Global Compact.

As employees of SCA, compliance with the Code of Conduct is a personal responsibility. Advocating sound business practices, fair labour conditions and a good environment is an ongoing process. By visualising and discussing the dilemmas that arise, we can work together to keep the Code of Conduct alive.

Our actions and conduct in our everyday lives, are pieces of the puzzle building the company that we are proud to work for.

Sincerely
Ulf Larsson, CEO



Contents

1. Understanding and complying with the Code of Conduct	1
2. Our workplace	2
3. Conducting fair business	4
4. Human rights	6
5. Environment and sustainability	8
6. Communication	9
7. Information security and privacy	10
8. Reporting a suspected breach	11

1. Understanding and complying with the code of conduct

About the Code of Conduct

Our Code of Conduct is an expression of who we are and how we do business at SCA. We want to create value for our stakeholders and positive relationships with employees, customers, shareholders, society and our business partners. We must always do so based on our core values: responsibility, respect, and excellence.

Our Code of Conduct – which is based on the UN Declaration of Human Rights, the International Labour Organization (ILO) Core Conventions, the OECD Guidelines for Multinational Enterprises and the ten principles of the UN Global Compact – describes not only how we apply our core values in practice, but also what you can expect from SCA and what others can expect from us.

The Code of Conduct contains examples of how we should act to comply with our principles. However, it does not cover all situations that may arise, or all the laws, regulations and internal rules that may apply. Therefore, please remember to always exercise good judgement in every situation you face so that you can be sure that you are acting responsibly and with integrity in everything you do for the company.

In some situations, the principles of the Code of Conduct may set higher standards than legislation, local customs, and practices. In such instances, you should follow SCA's own higher standards. If you are unsure of how to apply the Code of Conduct, you should contact your manager, HR manager, or one of SCA's corporate lawyers.

Who does the Code of Conduct apply to?

Every SCA employee has an important role in helping to protect our company and its reputation. As an employee, you are therefore personally responsible for familiarising yourself with the content of the Code of Conduct and acting accordingly. The Code of Conduct applies to all operations and all employees within SCA as well as temporary employees, consultants and others who represent SCA or act on its behalf.

Each manager at SCA is responsible for ensuring compliance with and application of the Code of Conduct. This includes, among other things, ensuring that employees are properly informed and trained. As a manager at SCA, you are responsible for setting a good example and being available for employees who have questions about the Code of Conduct or who want to report a potential violation.

Co-owned businesses that SCA controls must adopt and comply with the Code of Conduct. In businesses that SCA does not control, our representatives must work to ensure application of and compliance with the Code of Conduct or other equivalent rules.

SCA's suppliers and other business partners are expected to adhere to principles similar to those in the Code of Conduct in their own operations. Compliance with these principles is an important criterion when SCA selects business partners.

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2. Our workplace

A safe and healthy working environment

SCA puts health and safety first. Our most important goal is that all employees and others operating on our sites return home healthy and unharmed after work. We have a zero vision for work-related accidents and work continually to improve workplace health and safety. We implement preventive measures to address risk areas and monitor and follow up on the results.

It is the responsibility of every employee to know and comply with all applicable health and safety rules, policies and procedures in their area of work. Each of us also has a responsibility to address or report hazardous working conditions and accidents, as well as work-related injuries and illnesses. Each manager should ensure that all employees and contractors receive the necessary training and protective equipment.

Remember:

- Take responsibility for your own health and safety
- Immediately report illegal or unsafe working conditions to your manager
- Actively participate in relevant safety training programmes and make suggestions to improve your working environment
- Never ignore safety devices on machinery or requirements for personal protective equipment

Respect and openness

We treat all employees fairly and with dignity and respect. We build trust through open, honest communication and dialogue.

Remember:

- Always treat your colleagues with respect, and act if you see someone else not doing so
- Be sure to explain your decisions to the person(s) affected
- Suggest improvements in your workplace to your manager

Diversity and non-discrimination

SCA safeguards the equal value of all people and mutual respect. We value diversity, and work to further develop it among our employees and to ensure that all employees reach their full potential in an environment based on respect and trust. We have zero tolerance for victimisation.

All employees must be recruited, selected, evaluated and promoted on an objective basis regardless of gender; transgender identity or expression; marital status; parental status; ethnic, national or social origin; sexual orientation; religion; political affiliation; age; disability; or other status protected by law.

Remember:

- Employment decisions must always be based on professional qualifications such as education, experience, and merit
- Always treat your employees with dignity and respect

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Zero tolerance for harassment

SCA does not tolerate sexual or other forms of harassment, threats, or other illegal or inappropriate behaviour.

Remember:

- Contribute to a work environment that is free from violence, threats or any form of bullying
- Report all forms of harassment and inappropriate behaviour

Working conditions and compensation

SCA provides fair wages and benefits and complies with the terms and conditions of employment, including minimum wages and working hours, in accordance with applicable legislation and collective agreements at all locations where SCA operates. In cases where there are no collective agreements, we apply applicable industry standards.

Protection of company property and assets

SCA's property and assets are to be used in its operations and in accordance with SCA's internal regulations. They must never be used for unauthorised private use, illegal activities, or any other inappropriate purpose.

Remember:

- Protect SCA's property from loss, damage, theft, misuse or other unauthorised use
- Never use SCA's computer and mobile phones for unauthorised or inappropriate purposes
- Do not use SCA's other assets or resources (such as vehicles, machinery or company premises) for private purposes without explicit authorised consent



3. Conducting fair business

Business ethics

SCA's business operations are founded on honesty, integrity and responsible business conduct. We will always comply with all applicable legislation and SCA's policies and instructions.

Anti-corruption

Bribery, fraud, extortion, and all other forms of corrupt activities are strictly prohibited. We must never, either directly or indirectly through anyone else, offer, give, accept, authorise or promote payments, gifts or other benefits that may influence or be perceived to influence the objectivity of a business or government decision. Consult one of our corporate lawyers if you are unsure about what applies.

Remember:

- Never accept or give gifts in the form of cash or cash equivalent
- Never give or accept gifts, meals, or entertainment if it could be perceived that something is expected in return, such as an advantage in a sourcing or contract negotiation, or a faster decision in a government process, known as "facilitation payments"
- Do not offer or accept gifts that you suspect may violate the business partner's own policies or industry standards
- Never give a gift to a public official or a person representing an authority
- Do not provide sponsorship or donations if there is a risk that it could be seen as a form of bribery

Fair competition

SCA stands for open and fair competition. Therefore, we will always do business honestly and in accordance with applicable competition laws. These regulations generally prohibit agreements and arrangements between competitors that restrict competition, including price fixing, allocation of customers and geographical markets, cartelisation, and abuse of a dominant position.

Competition law is complex and can be applied differently depending on the specific situation. If you are unsure what is permissible, consult one of our corporate lawyers.

Remember:

- Never propose or enter into agreements or understandings with a competitor on matters of pricing, bidding, terms of sale or geographic market
- Use only authorised sources for information on competitors and always cite the source

Conflicts of interest

We must always act in the interest of SCA and avoid conflicts of interest. A conflict of interest arises when private interests, personal relationships, or external activities either influence your behaviour or appear to do so.

Remember:

- Avoid engagements or activities that may cause others to question your impartiality or loyalty to SCA

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- If you see that there is a risk of a conflict of interest, including for yourself, always inform your manager
- Do not do business with companies that are owned or operated by a family member, partner or close friend without prior authorisation from your manager
- As a manager, you should not allow people who are related or have another close relationship to report directly or indirectly to each other

Money laundering and trade sanctions

SCA conducts its business in accordance with applicable money laundering legislation. Money laundering is defined as various arrangements to either conceal criminal acts or to make them appear legal. SCA also undertakes to comply with applicable national and international regulations on trade restrictions and sanctions that apply in the countries where we operate.

Remember:

- Follow SCA's instructions and procedures to evaluate business partners and ensure that they conduct legal and legitimate business
- Be attentive and contact your manager if you are asked to transfer money to a country not related to the business transaction
- Ask questions if you suspect something does not seem right. Contact one of our corporate lawyers or a member of SCA's corporate finance team

Bookkeeping, accounting and tax

All accounting and financial information must be accurate and comply with applicable regulations and SCA's accounting standards. SCA must always comply with applicable tax laws and regulations.

Remember:

- Ensure that all payments are recorded correctly
- Never provide false or misleading information about a transaction

Product safety

SCA must ensure that customers and consumers receive safe, high-quality products and services that are manufactured and delivered with respect for people and the environment. The products must be safe for the user and the environment, and meet customer and regulatory requirements for product safety and labelling.

Remember:

- Always comply with applicable laws, regulations and SCA's rules for product safety and labelling

Insider trading

Insider information is information that is not generally available and that can reasonably be expected to have an impact on the price of SCA's shares or other financial instruments. Anyone possessing insider information about SCA may not disclose such information to third parties and may not buy or sell SCA shares. Not only could violation of insider legislation damage SCA's reputation but it could also lead to civil and criminal liability for the individual.

Remember:

- Never trade in SCA shares if you have inside information
- Never disclose inside information to friends, family, or any other unauthorised person



4. Human rights

Respect for human rights

SCA respects and safeguards human rights. We expect the same from our business partners. SCA supports and respects internationally prescribed human rights in all places where we operate. In accordance with the UN Guiding Principles on Business and Human Rights, we have integrated these principles into our Code of Conduct as well as into our daily operations.

Remember:

- Maintain and communicate our values and standards in our workplace, in our operations and to our business partners
- Ensure that we have processes in place for the protection of human rights and the rights of indigenous peoples
- Take action in cases where we could potentially cause or contribute to negative impact on human rights
- Monitor and communicate results to our stakeholders and use our influence to strengthen human rights in the places where we operate through various community engagement and external initiatives, such as the UN Global Compact

Freedom of association

SCA respects the fundamental right of employees to freely decide whether to be represented by trade unions and the right of employees and their trade unions to negotiate collective agreements. We also respect an employee's right to refrain from joining a trade union. SCA applies internationally established labour law standards, accounting for current practice and the rules that apply where we operate.

SCA does not tolerate harassment, intimidation, or retaliation against anyone because of their involvement in a trade union, or because someone has opted out of such involvement.

Remember:

- Respect the right of employees to freely form and join trade unions
- Never subject anyone to harassment, intimidation, or retaliation owing to involvement in a trade union
- Never subject anyone to harassment, intimidation, or retaliation owing to refusal to be involved in a trade union

Zero tolerance of child labour

SCA recognises children as a group in particular need of protection. The Children's Rights Principles commit us to respect and advocate the rights of children in our business and society. Where our activities affect children, we will give special consideration to their interests.

SCA does not tolerate child labour in our facilities or in operations run by our business partners. We strictly comply with applicable national and international legislation on minimum age in all locations where we operate.

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Remember:

- Make sure you understand the age requirements under applicable law before employing anyone under the age of 18
- Report suspicions of child labour at SCA or at SCA's business partners

Zero tolerance of forced labour

SCA does not tolerate the use of, participation in, or benefit from forced labour in any form. No employee will be required to surrender their identity documents or pay deposits upon commencement of employment. Everyone has the right to terminate their employment in accordance with the applicable contract or legislation.

Remember:

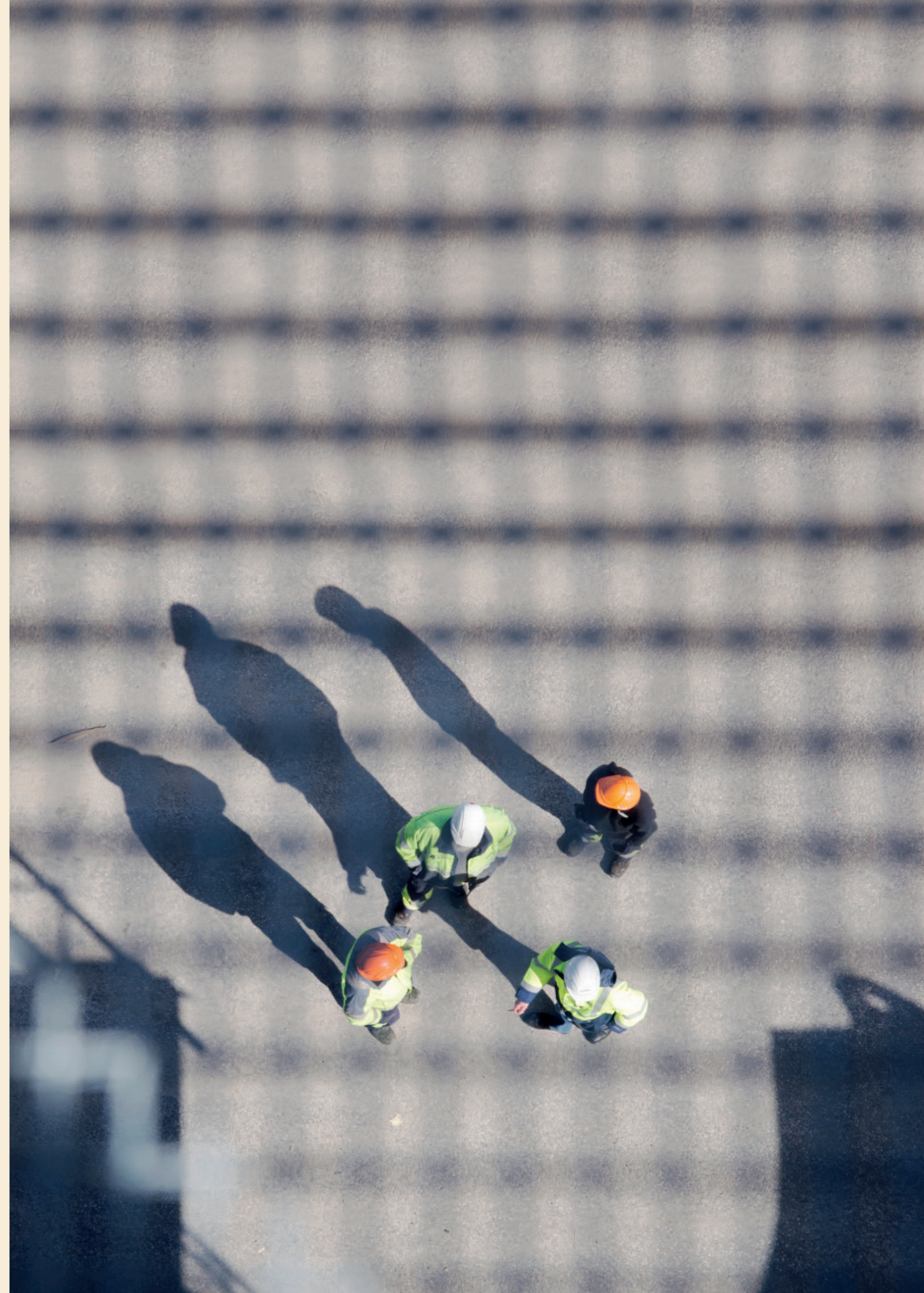
- Report suspicions of forced labour or physical punishment at SCA or at SCA's business partners

Rights of indigenous peoples

We respect the rights of indigenous peoples and their social, cultural, environmental, and economic interests.

Remember:

- Take action in cases where we can potentially cause or contribute to a negative impact on the rights of indigenous peoples



5. Environment and sustainability

SCA takes responsibility for and safeguards sustainability and the environment in all its operations. SCA develops sustainable solutions through safe, resource-efficient and environmentally appropriate sourcing and production. We minimise negative environmental impacts and support the development of environmentally friendly alternatives by combining innovation, technology and efficiency, and continuously evaluating the environmental impact in SCA's value chain.

SCA is continually engaged in improving the company's environmental performance through clear and measurable targets. SCA works to ensure sustainable forestry where we combine high production of valuable renewable raw materials with extensive consideration for the other values of the forest.

Remember:

- Use resources efficiently in your daily work and minimise all types of waste
- If you have suggestions that could lead to innovations with a positive environmental impact, submit them to your manager
- Follow applicable regulations and SCA's procedures to ensure that SCA manages and transports waste, chemicals, and other hazardous substances in an environmentally safe manner

Sustainable forestry and responsible wood supply

The forest is the foundation of SCA's operations. Our ambition is to keep the forests at least as rich in biodiversity, nature experiences and raw materials in the future as they are today. It is important for us to manage the forest with respect for its conservation values, the climate and SCA's stakeholders. We do this through responsible, sustainable forest management and by preserving biodiversity.

Remember:

- Comply with SCA's regulations on responsible forestry and responsible wood supply and the requirements set out in the international certification programmes that SCA follows

Relationships with society

SCA is a responsible company that participates in social development and shows respect for people and society. We want to make a positive contribution to the communities where we operate. Our ambition is to develop long-term relationships with local communities through open and honest dialogue. SCA's community engagement is conducted in partnership with organisations whose goals and objectives are consistent with SCA's own core values.

Remember:

- Ensure that the views of local communities where we operate are heard and welcomed
- Actively seek contact with those affected by activities that impact your communities and neighbours, even when such is not required by laws and regulations
- Always ensure that you have authorised approval for donations or sponsorships in SCA's name

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6. Communication

SCA applies open and transparent communication within the framework of business confidentiality and applicable legal requirements. We want to develop and maintain good relations and have a constructive and fruitful dialogue with our stakeholders.

For public statements on behalf of SCA, specific spokespersons have been appointed.

Remember:

- Always consult with SCA's central communications department before discussing SCA issues with a reporter. SCA's press office can always be reached at +46 (0)60-193301
- Refer all questions from analysts and investors to SCA's Investor Relations Manager
- Do not give the impression that you are speaking on behalf of SCA when speaking in private contexts, such as on social media, without first obtaining authorised approval

Marketing

All SCA products and services must be presented in a correct and fair manner. SCA shall market and label its products in a factual and informative manner. Considering children's needs for special protection in marketing, we shall not use marketing towards children that may negatively affect children's rights or health.

Remember:

- Make sure you understand and comply with applicable sales and marketing rules
- Ensure that marketing to children recognises their vulnerability and complies with applicable laws and regulations
- Never make false claims or provide misleading information about SCA's products or their features

Political activities

SCA is politically neutral and does not permit payments or other donations to political parties, candidates or their institutions, offices, and representatives. SCA's name may not be used in political campaigns or to support the interests of political parties or candidates.

Although SCA does not participate in party politics, we continuously engage in debates through activities on topics that affect our business, our employees, and the communities in which we operate.

Remember:

- Consult with someone from SCA's communications department if you have questions regarding activities in the area of social issues
- Do not claim to speak on behalf of SCA or imply that SCA supports your views when participating in political activities in private
- Do not use SCA resources in connection with your personal involvement with or support for a politician or political party

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7. Information security and privacy

We must always protect confidential information from unauthorised use and disclosure. Confidential information is information, such as SCA's business or marketing plans, product development information, inventions, manufacturing methods, employee and salary information, medical information, financial information or other trade secrets, that is not publicly known.

We respect the individual's right to privacy and always process personal data responsibly, in accordance with applicable legislation and SCA's internal regulations.

Remember:

- Be careful when discussing issues related to SCA or working from a laptop in a public place
- Protect data according to SCA's information and IT security regulations
- Be wary of links and attachments in emails that look strange or come from senders you do not recognise
- Do not share company information that is not publicly available externally, for example on social media, without first obtaining authorised approval
- Process personal data in a secure and confidential manner, and ensure that there is always a valid purpose and legal basis for processing personal data

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8. Reporting a suspected breach

If you observe something that you believe may violate laws, regulations, or the provisions of the Code of Conduct, it is important that you report it immediately. By making your voice heard, you help protect SCA's employees and brand.

How to make a report

If you work at SCA, your immediate supervisor is generally best positioned to address the matter. You can also contact your immediate supervisor's superior, your HR manager, a corporate lawyer or a trade union or labour council representative. If for some reason you do not feel comfortable doing so, you can instead use one of the channels below, which are also available to people outside the SCA organisation.

Specific recipients

Each business unit has specifically designated functions for independently and autonomously receiving and managing reports. Your report can be submitted both in writing and verbally, either in a face-to-face meeting or by other means.

The whistleblowing system

The whistleblowing system is an encrypted reporting service provided by an external party. Your report is sent via an external link available on the SCA intranet and on the SCA website, www.sca.com. We encourage you to be open with your identity, but you can also submit a completely anonymous report via the system. However, an anonymous report may be more difficult to investigate and follow up.

What happens once a report has been submitted?

If you report a genuine suspicion in good faith, you have the right to expect the following:

- Protection against all forms of retaliation and adverse treatment for making a report. Retaliation is itself a serious breach of the Code of Conduct
- Confidential, prompt, and professional treatment and investigation of your complaint
- Feedback on your case with information on how your complaint has been handled.
The amount of information you receive depends on factors such as privacy considerations

However, a staff member who knowingly makes a false report may be subject to disciplinary measures.

Consequences of breaches of the Code of Conduct

Breaches of the Code of Conduct will always be taken very seriously and may lead to disciplinary action up to and including dismissal. If the violation constitutes a criminal offence, it may also result in legal sanctions such as fines, imprisonment, or damages.

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