

## Group Human Rights Policy

This policy supports Sappi's Group Sustainability Charter and our approach to sustainable development.

Sappi's purpose is to build a thriving world by unlocking the power of renewable resources to benefit people, communities and the planet. Our sustainability strategy is aimed at creating long-term value for all stakeholders from sustainable woodfibre products and through ongoing improvement in key areas.

Our commitment to sustainability is based on being a trusted, transparent and innovative partner in building a biobased circular economy, underpinned by our values: *As OneSappi, we do business safely with integrity and courage, making smart decisions that we execute with speed.*

Throughout our business, we work to realise the ambitions of the United Nations (UN) Sustainable Development Goals and the UN Global Compact.

In line with our commitment to the **OECD Guidelines for Multinational Enterprises**, we acknowledge our responsibility to contribute to economic, environmental and social progress with a view to achieving sustainable development while respecting the internationally recognised human rights of those impacted by our activities. We subscribe to the principles of the **International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work** as well as the **ILO's fundamental conventions**, including a safe, healthy working environment; and support the observance of human rights as set out in the **Universal Declaration of Human Rights** and the **International Bill of Human Rights**. We adhere to the **UN Guiding Principles on Business and Human Rights** and expect the same of our suppliers and their value chains. In addition, our **Sappi Code of Ethics** sets the foundation for our approach to human rights.

### Responsibility

The chairman and committee members of the Social, Ethics, Transformation and Sustainability (SETS) Committee are responsible for overseeing and regularly reviewing human rights performance and compliance. The Sappi Limited Chief Executive Officer (CEO) is responsible for the implementation of Sappi's human rights policy.

### Commitments

As a responsible business required to comply with all applicable laws and to respect human rights, we commit to:

- Engaging with stakeholders to identify vulnerable stakeholder groups within our value chain where there may be higher risk of human rights abuse, including modern slavery, forced labour and human trafficking.
- Assessing human rights and related environmental risks and associated impacts within our own enterprise and associated value chain.
- Seeking to prevent or mitigate adverse human rights impacts that are directly related to our operations or through our business relationships.

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## Group Human Rights Policy continued

- Providing for or cooperating in the remediation through legitimate processes where we identify that we have caused or contributed to adverse human rights impacts.
- Maintaining and promoting an independently managed reporting service for stakeholders to report any grievance or violation identified.
- Monitoring Sappi's performance in terms of the above and regularly communicating the findings.

### Stakeholders

We recognise that risks related to human rights vary between stakeholder groups. Accordingly, we strive to take meaningful actions throughout our business and day-to-day interactions, with the following emphases:

#### Employees

- Respect the right to freedom of association and collective bargaining. Those situations in which the right of freedom of association and collective bargaining are restricted under law, we will facilitate and not hinder parallel means of independent and free association and bargaining.
- Promote equality of opportunity and eliminate discrimination based on race, gender, colour, ethnicity, age, religion, political and sexual orientation, nationality, union membership, physical disability or HIV/AIDS status.
- Close gender pay gaps that may exist by implementing equal remuneration for work of equal value.
- Provide training on human rights and modern slavery.
- Forbid physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation and the use of child, compulsory or forced labour (modern slavery).
- Protect the health and safety of our employees, promote their wellbeing and in the case of incidents, provide compensation that at the very least meets basic needs.

#### Communities in and around our operations

- Observe legislation and respect the cultural values of societies.
- Seek to understand and appropriately manage any human rights impacts that our operations may have on the local communities in which we operate.
- Where relevant, engage local communities and indigenous peoples to identify traditional and cultural heritage values that may potentially be affected by our operations, in order to reach consensus on strategies to address these concerns.
- Work to resolve legitimate land claims in South Africa in the interest of justice.

#### Suppliers in our value chain

Require our suppliers and their first-tier suppliers to:

- Respect human rights and environment-related obligations and act in full accordance with our codes of conduct, policies and guidelines concerning social responsibility, labour standards, human rights and environment, and
- Commit to report on human rights violations openly and transparently within our value chain, should these occur.

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## Group Human Rights Policy continued

Under our Thrive25 strategy we are playing an active role in solving societal challenges and using our expertise to help create a sustainable future that meets the needs of a rapidly evolving society. We are also unlocking value for our staff and communities as we build our business by delivering social impact.

Our Thrive25 sustainability goals under our nine priority SDGs are driving our actions to achieve this.

This policy aligns with our holistic view of sustainability as integral to a thriving world, embedded in **Prosperity**, **People** and the **Planet** (3Ps).

Steve Binnie  
Chief Executive Officer  
Sappi Limited

Valli Moosa  
Chairman  
SETS Committee

### Priority SDGs\* for:

Sappi Southern Africa

Sappi group (Global)



\* United Nations Sustainable Development Goals.