Statement on modern slavery

Modern slavery is defined as slavery, servitude, forced or compulsory labour and human trafficking and it can be found in every corner of our globalised world. In 2017, it was estimated that 40.3 million individuals were living in modern slavery, with victims being exploited for the purposes of sex, forced labour, forced marriage, domestic servitude and enforced criminality. The UK Modern Slavery Act requires commercial

organisations in any sector with a global annual turnover of £36 million or more that do business in the United Kingdom to disclose the steps they are taking to address modern slavery in their business and supply chain.

To demonstrate Sappi's commitment to preventing the occurrence of modern slavery and human trafficking in our operations and supply chains, we are publishing this voluntary modern slavery statement: Modern slavery (slavery, servitude, forced labour and human trafficking) is a global concern with long-lasting impacts on affected individuals and communities. There is an increasing focus by consumers on ethical fashion and the social and environmental impacts of the products they use. Given that our products are an indispensable part of daily life and given that we have direct and indirect customers in over 150 countries, we recognise that we have a responsibility to ensure that slavery does not enter our supply chain. While we do not currently see this as a material issue, we take a zero-tolerance approach towards modern slavery in any form.

Our policies and operational processes embed our commitment to respect for human rights. As stated in our Group Human Rights Policy, we subscribe to the principles of the International Labour Organization (ILO), uphold and commit to the ten principles set out in the United Nations Global Compact, and support the observance of human rights as set out in the Universal Declaration of Human Rights. We do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate in our workforce. We respect the rights of our employees and contractors, including freedom of association and collective bargaining.

Throughout our operations, we seek to avoid complicity in human rights abuses, and to uphold relevant international standards. We are making progress in rolling out our group Supplier Code of Conduct which requires our suppliers to implement policies such as freely chosen employment which prevents the use of forced, slave, bonded, indentured or involuntary prison labour and to align with the United Nations Universal Declaration on Human Rights, as well as the ILO Convention No 138 on Minimum Age.