

ARCTIC PAPER S.A. - CORPORATE SOCIAL RESPONSIBILITY POLICY

Arctic Paper is committed to manage its business in a manner that recognizes respects and promotes social responsibility, in active and constructive dialogue with local, national and international stakeholders. Social responsibility means responsibility for the impacts of decisions and activities on society and the environment.

Stakeholders

Our key stakeholders are customers, business partners (agents), employees, investors, suppliers and subcontractors, local communities and local, national and international governmental authorities.

Transparency and accountability

We shall be open and transparent in our decisions and activities that have an impact on society and environment. We are accountable for our actions. We shall always comply with applicable laws and regulations and we shall respect, consider and respond to the interest of our stakeholders. We shall behave ethically and actively promote ethical behaviour based on the values of honesty, equity and integrity. We believe in fair and free trade. We shall refrain from any kind of bribes and corrupt business.

Human and labour rights

We respect and promote international human and labour rights. We expect the same commitment from our suppliers and subcontractors. We do not allow discrimination or harassment of any kind. Our employees have the right to organize themselves, join associations and to negotiate with the company. We do not allow forced or child labour. We shall actively strive for the continuous improvement of health and safety in the workplace and aim to provide a safe working environment with highest degree of physical, mental and social well-being for our employees.

Environment

We are committed to sustainability. We shall always strive to minimize our impacts on environment. Raw materials, energy and other resources shall be used efficiently and with environmental concern. The environmental concern shall be addressed throughout our value chain and be an integral part of our purchasing procedures. We shall verify the origin of wood and fibre and only procure them from legal and controlled sources. We shall actively promote certified and responsible forestry.

Integrating the CSR Policy into our Organization

This CSR Policy applies to all Arctic Paper operations and all Arctic Paper employees. It is the responsibility of each Managing Director within the Arctic Paper Group to make this CSR Policy known, implemented and complied with at their respective operations. All superiors with operational, personnel or business process responsibilities shall actively support the implementation by adapting existing and new local policies, procedures and decision making processes.

January, 2027

Michal Jarczyński, CEO

Arctic Paper S.A.