DIVERSITY POLICY

I. INTRODUCTION

1.1 Objectives of the Policy

This policy sets out Arctic Paper's guiding principles regarding diversity, inclusion and equal treatment of employees

At Arctic Paper, we believe that the diversity of our employees is a strength that enables the organization to grow. In addition to the talent and competencies employees bring, different backgrounds, experiences and perspectives contribute to greater openness, improved ways of working and new solutions. This supports our performance and competitive advantage, while contributing to the Sustainable Development Goals.

We are committed to fostering an inclusive working environment where all employees are treated with dignity and respect, have equal opportunities and are encouraged to contribute to their full potential.

1.2 Scope of Application

This policy applies to Arctic Paper S.A. and its controlled subsidiaries (together referred to as Arctic Paper), including their management teams and employees in all countries where the Group operates.

II. GUIDING PRINCIPLES

2.1 Equal opportunities

The Diversity Policy applies to all employees, regardless of their position. Employees have equal opportunities for professional growth and access to training appropriate to their skills and development needs. Employee evaluations are based on objective criteria, including professional performance and potential.

2.2 Fair recruitment

When recruiting employees, we focus on candidates' skills, qualifications, and accomplishments. Recruitment decisions are based on objective, job-related criteria, without bias or discrimination. We value the different experiences and perspectives that candidates can bring to the organization.

2.3 Remuneration

We remunerate employees based on objective, job-related criteria, including the requirements of the position, qualifications, experience, performance, and relevant labor market conditions. We are committed to equal pay for equal work or work of equal value, regardless of gender or other diversity characteristics.

2.4 Discrimination

Respect and equal treatment are fundamental principles at Arctic Paper. As part of our commitment to human rights, we do not tolerate discrimination, harassment or bullying in any form. We are committed to providing a working environment where all employees are treated with dignity and respect. We actively work to prevent discrimination, harassment and bullying and take appropriate action if incidents occur.

2.5 Reporting irregularities

Employees are encouraged to report concerns regarding discrimination, harassment, bullying or unequal treatment through their manager, Human Resources, local reporting channels, or the reporting channels established under Arctic Paper's Whistleblower Policy, as applicable. Reports will be handled confidentially to the extent possible, with consideration for the rights of all individuals involved. Retaliation against anyone raising a concern in good faith is not tolerated.

2.6 Supporting diversity

Arctic Paper promotes a working environment where different perspectives, experiences and backgrounds are respected and valued. Managers are responsible for fostering inclusive teams, ensuring fair treatment, and supporting equal opportunities for development. We support managers in developing the knowledge and skills required to fulfil these responsibilities.

III. OWNERSHIP OF THE POLICY

The President of the Management Board of Arctic Paper S.A. is the owner of this policy and holds overall accountability for its implementation across the Group.

Managers at all levels are responsible for applying the principles of this policy in their respective areas of responsibility, ensuring equal opportunities, fair treatment and an inclusive working environment.

All employees are expected to comply with this policy, treat others with dignity and respect, and raise concerns regarding discrimination, harassment or bullying through the appropriate reporting channels.

Group Human Resources, in cooperation with local HR functions, is responsible for supporting implementation, providing guidance and coordinating periodic reviews of the policy.

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