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ARCTIC PAPER

ARCTIC PAPER S.A. - Diversity Policy

The purpose of this policy is to govern our internal approach to diversity. The Policy sets forth Arctic Paper's guiding principles with respect to our employees.

At Arctic Paper, we believe that the diversity of our workforce is a strength that enables the organization to grow. In addition to the talent and competencies employees bring to the table, it is the diversity of gender, age, education or background, and therefore experience, that leads to greater openness, improved work or new solutions. This translates into our performance and Arctic Paper's competitive advantage. Supporting diversity also allows us to contribute to the Sustainable Development Goals.

November, 2021


Michal Jarozynski, CEO
Arctic Paper S.A.



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I. INTRODUCTION

1.1. Objectives of the Policy

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The purpose of this policy is to govern our internal approach to diversity. The Policy sets forth Arctic Paper's guiding principles with respect to our employees.

1.2. Scope of Application

This policy applies to Arctic Paper S.A. and the companies connected with Arctic Paper (i.e. Arctic Paper Kostrzyn S.A., Arctic Paper Munkedals AB, Arctic Paper Grycksbo AB and the sales offices, hereinafter referred to as Arctic Paper), its entire management team and employees, in each country where the company operates.

1.3. Definitions used in the Policy

Diversity: the characteristics of the persons employed relating to their differences, which may include the following aspects: gender, national and ethnic origin, religion, irreligiousness, world-view, degree and type of disability, state of health, age, psychosexual orientation or gender identity, family status, lifestyle, form of employment as well as other possible aspects.

Inclusion: Behaviours that embrace and include diversity. These allow employees to be empowered by respecting and valuing what makes them different in the many ways defined above. An inclusive process engages each person and makes people feel valued and impactful to the organization.

Mobbing: actions or behaviours related to an employee involving persistent and prolonged harassment or intimidation of an employee, aimed at humiliation of an employee, isolation or elimination of an employee from his/her team of co-workers, resulting in lowering his/her evaluation of professional usefulness.

II. IMPLEMENTATION OF THE DIVERSITY POLICY FOR EMPLOYEES

2.1. Equal opportunities.

The Diversity Policy is applicable to all employees of Arctic Paper, regardless of the position they hold within the company. All our employees have the opportunity to grow within the organization regardless of their gender, age or any other distinguishing factors.

Employees have the opportunity to broaden their knowledge and skills within the organization. They have access to training tailored to their skills and professional development needs.

Employee evaluations are based solely on objective criteria: professional performance and potential.



2.2. Fair recruitment

When looking for new employees and conducting the hiring process, we focus on the candidate's skills and accomplishments. No biased criteria such as gender, age or beliefs are considered. When looking for talented individuals, we value all aspects of diversity in potential employees believing that they can further contribute to the organization.

2.3. Remuneration

We pay employees according to their position assessment, qualifications, experience and performance, regardless of diversity factors.

2.4. Discrimination

That each of our employees is entitled to respect and equal treatment is the basis for organizational performance. As part of our commitment to human rights, the Company does not discriminate for or against anyone in terms of gender, age, national origin or any other characteristic. We will deal with any harassment that occurs. We do not tolerate any form of mobbing and we actively take steps to prevent this.

2.5. Reporting irregularities

We enable our employees to report (anonymously or not) any complaints about possible mobbing or unequal treatment. This refers to any violations of human rights, discrimination on the basis of age, gender, disability, national origin, faith, beliefs or other diversity characteristics. The rules for employee reporting of violations involving such situations are set forth in the Whistle blower Policy and Whistleblowing guidelines.

2.6. Supporting diversity

We support diversity within the organization and our goal is to take steps to help our employees understand the role of diversity in the organization. We will train managers how to manage a diverse team and make the most of its potential.

III. OWNERSHIP OF THE POLICY

The owner of the Diversity Policy is the President of the Management Board of Arctic Paper SA.

The policy was adopted in November 1th 2021.

If you have any comments or questions regarding the Diversity Policy, please feel free to contact the Sustainability Team: sustainability@arcticpaper.pl.