



Sappi

Code of Ethics

sappi

Inspired by life

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Message from the CEO

We have defined our 2020Vision, our financial targets and our values. We also said that, through the power of One Sappi our aim is to be a trusted and sustainable organization with an exciting future in woodfiber.

I'm very encouraged by the enthusiasm with which all our people have embraced our Strategy and new Mission, 2020Vision and Values.

We are a global company, operating in many different countries and jurisdictions. Presenting a coherent and consistent Sappi to our staff, customers and other stakeholders ensuring that we behave ethically, is more important than ever. In line with our strategy and with our commitment to being a responsible corporate citizen, we have updated our Code of Ethics.

Although we recognise that our stakeholders already operate to high ethical standards, there are differences between regions and countries, which are not static, but change over time. As One Sappi, our aim is that all our stakeholders should have a very clear understanding of the principles which should inform their decisions and actions and the way they should conduct themselves. The Code applies to all our stakeholders from members of the board to our newest employees.

The Code is central to our reputation, which lies at the heart of our success. We need to ensure that everything we do builds and protects that reputation. By behaving in accordance with the Code, we create a supportive, positive atmosphere that builds morale and enhances our reputation.

Meeting our goal of actively transforming Sappi into a growing and profitable diversified woodfiber group depends on our ongoing commitment to responsible business principles across the group. How we do business is never a short-term consideration, but should rather contribute to our long-term sustainability. For our Code of Ethics to be effective each day, we have to live our core values of doing business with integrity and courage; making smart decisions, which we execute with speed.

Our commitment to act as responsible corporate citizens aligned with the United Nations Global Compact includes specific compliance with all laws and regulations in the countries and jurisdictions where Sappi operates. Key topics to be aware of are summarized as part of our Code.

Just as you have wholeheartedly embraced our 2020Vision, I ask you to embrace the Code of Ethics, engage with the awareness and training programs, keep abreast of any changes in Sappi policies, and behave in a manner which advances our reputation.

Thank you

Steve Binnie
*Group Chief Executive Officer,
Sappi Limited*



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The Code is central to our reputation, which lies at the heart of our success.

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How we behave

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As a foundation, we obey the laws of all the countries and jurisdictions in which we conduct business.

Every person should be thoughtful, considerate of others, use common sense and act in accordance with our value statement.

“At Sappi we do business with integrity and courage making smart decisions, which we execute with speed.”

The following principles should guide our decisions and actions:

- Treat others as you would like to be treated
- Be truthful and honest
- Help to combat dishonesty and crime
- Protect the environment, and
- Respect diversity and do not discriminate.

Always strive to improve the reputation of Sappi through your positive actions and avoid any action that could lower Sappi's reputation by:

- Familiarising yourself with the Code, know what it means and what is expected of you
- Communicating to our business partners (suppliers, contractors and customers) that we expect them to familiarise themselves with the Code of Ethics and abide by its principles
- Reporting breaches of the Code of Ethics, and
- Avoiding any form of harassment, bullying, racism and discrimination, thereby also protecting all our basic human rights.

Application and enforcement of the Code of Ethics (Code)

The Code applies to all Sappi's boards of directors, officers and employees. Violations of this Code will lead to disciplinary action in accordance with Sappi's disciplinary procedures. The outcome of disciplinary action may involve summary dismissal and/or criminal prosecution.

In addition to our employees, our Code and our approach to responsible business practices will be promoted to our suppliers, contractors, stakeholders and customers to enable them to understand how we will do business with them and how we expect them to do business with us. If we encounter a supplier, contractor, customer or other stakeholder who refuses to embrace the principles and values reflected in the Code, we will carefully evaluate whether a relationship with that party can be maintained. A guideline on stakeholder commitment to responsible business practices have been created to assist in managing such situations.

In case of uncertainty on applicable behavior you should approach your line manager, your Legal Department or the Internal Audit Department. Alternatively send an eMail to Ethics@sappi.com.

All relevant policies can be found on either Sappi Net <http://sappinet.za.sappi.com/policies> (for employees) or on our website <http://www.sappi.com/policies>.





We support open communication and encourage discussions with managers to identify unethical behavior.

Reporting and whistle-blowing

We support open communication and encourage discussions with managers to identify unethical behavior.

If you suspect, or believe you have observed, unethical or illegal conduct, your line manager should be notified promptly.

If you feel uncomfortable bringing an allegation of unethical or illegal conduct to your line manager's attention, there are others in management you could approach. Every Sappi manager is available to receive such reports and will ensure that the appropriate action is taken. You may also report incidences of unethical conduct to either the Human Resources-, Legal Services- or Internal Audit Departments in person or in writing.

Should you feel that there has not been an appropriate response to the unethical behavior you've reported, you can send an eMail to Ethics@sappi.com or contact the confidential, independently operated Sappi Hotline or eMail Ethicsline@kpmg.co.za. Country dial-in details can be found below:

Sappi Hotline	
South Africa	0800 00 3235 (Toll-free)
United States of America	+1 800 233 8213 (Toll-free)
All other countries	+27 (0)12 543 5380
eMail:	Ethics@sappi.com Ethicsline@kpmg.co.za



Access the KPMG web portal link through the following or the QR code alongside:
<http://www.thornhill.co.za/kpmgethicslinereport>

No retaliation

Our Group Whistle-blowing Policy, which can be accessed from our website, provides protection to whistle-blowers. Please note that Sappi will not accept or tolerate any retaliation against any colleague who reports a violation of the law or the Code of Ethics. Falsely reporting a violation knowingly may result in disciplinary action.

Where can I find further information?

- Read the [Sappi Group Whistle-blowing Policy](#).



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Through the power of One Sappi we aim to be a trusted and sustainable organization with an exciting future in woodfiber.

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Human rights

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Sappi's position on human rights is clearly laid out in our **Group Human Rights Policy**. Human rights are generally defined as basic standards of treatment to which all people are entitled, regardless of nationality, gender, race, sexual orientation, economic status or religion.

We commit to the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, and the International Labour Organization.

- **Employees:** We treat our employees with dignity and respect and promote diversity in the workplace.
- **Communities:** We engage with communities to build our understanding of potential human rights issues in order to enhance the benefits of our projects and operations and manage potential impacts.
- **Suppliers:** We encourage our suppliers to treat their employees, and to interact with communities in a manner that respects human rights.

Expected behavior

- All employees at Sappi are expected to treat with the utmost respect and dignity other employees and all stakeholders with whom they interact.
- We respect diversity and promote an inclusive environment that helps all employees to fully participate and contribute to Sappi's success.
- We provide equal employment opportunities and treat applicants and employees without bias.
- No one at Sappi should be discriminated against on the basis of race, religion, color, age, gender identity or expression, or sexual orientation.
- Workplace harassment, bullying, intimidation, or actual or threatened violence are prohibited.
- The use of child-, compulsory- or forced labour is prohibited.



Practical examples

Q

Question: *Harry constantly makes personal comments to Mary about her appearance in a way that makes Mary feel embarrassed and uncomfortable. It has reached the point where Mary hates coming to work. What should she do?*

A

Answer: Mary should report the situation to a manager she feels comfortable with or to someone in Human Resources. Harry's behavior is intimidating and offending Mary and may constitute harassment.

Q

Question: *Dick applied for a promotion. Although Dick's qualifications and experience were better than those of the other applicants, he did not get the job and another candidate was appointed. Dick feels that he may have been discriminated against or that nepotism played a role in the appointment. What should he do?*

A

Answer: Dick should report the concern to Human Resources and follow the relevant processes eg the Grievance Procedure.

Q

Question: *Frank overheard a colleague calling someone a name with racist overtones. What should he do about it?*

A

Answer: If Frank is comfortable in doing so, he should speak with the colleague and try to sensitize him to the impact of his words. Should the disrespectful treatment continue, Frank should discuss the matter with either his supervisor or with HR.

Where can I find further information?

- Read the [Sappi Group Human Rights Policy](#).
- Read the [Sappi Group Human Resources Policy](#).



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Protecting people and the environment underpins our approach to sustainability. We place the highest priority on the health and safety of our workforce and on the protection of the environment.

Health, safety and the environment

Protecting people and the environment underpins our approach to sustainability. We place the highest priority on the health and safety of our workforce and on the protection of the environment.

One of our main inputs is woodfiber, a natural resource which depends on healthy ecosystems. Accordingly, we promote sustainable forestry through internationally accredited, independent environmental management and forest certification systems. In our operations, by focusing on cleaner, more efficient manufacturing and increased waste reuse and beneficiation processes, we can earn more income and produce more with less – an approach which has obvious environmental and economic benefits.

Expected behavior – we must:

- Keep up-to-date on laws, regulations and practices related to safety and the environment that are relevant to our business.
- Report safety and environmental concerns or issues through the appropriate company channels.
- Strive to minimize our environmental impact in ways that are relevant to our business and important to the communities we serve, as set out in our Group Environmental Policy.
- Develop reuse and beneficiation processes throughout our operations.
- Take all reasonable measures to maintain a safe and healthy operating and working environment and to prevent workplace accidents and injuries.

Practical examples

Q
Question: *Obed's supervisor asks him to perform a task that Obed believes violates environmental regulations. What should Obed do?*

A
Answer: Obed should check with his supervisor to make sure he has understood the request and then he should explain his concerns. If Obed still feels that the request violates environmental regulations, he should report the matter to local or regional management or to the Sappi Hotline.

Q
Question: *Matthew's unit has a safety bonus plan based on its safety performance. He knows that (some) injuries are not being reported. What should Matthew do?*

A
Answer: It is very important to investigate injury producing accidents (and near misses) to determine the actions necessary to prevent similar occurrences. Employees should always notify their supervisor when an accident occurs in the workplace. If a colleague or supervisor is reluctant to report or record a work-related injury, Matthew should encourage him or her to report it. If the injury is not reported, then Matthew should contact the local safety officer, local management or the Sappi Hotline.

Where can I find further information?

- Read the [Sappi Group Occupational Health and Safety Policy](#).
- Read the [Sappi Group Sustainability Charter](#).
- Consult the [Sappi Group Environmental Policy](#) or [Sappi Group Climate Change Policy](#) available on Sappi Net (<http://sappinet.za.sappi.com/policies>) for employees, or on our website (<http://www.sappi.com/policies>) or;
- Speak to the local or regional safety officer.
- Speak to your mill or regional environmental manager.

Preventing fraud and corruption

Preventing fraud and corruption is not only a moral issue; it's also about doing good business. Bribery and corruption significantly reduces our ability to produce positive economic and social outcomes and it affects Sappi's long-term viability. We will act in observance of all applicable laws and regulations, such as the Foreign Corrupt Practices Act in the USA and other similar acts worldwide to maintain the highest possible standards in our accounting and financial procedures and statements.

At Sappi, we expect each of our stakeholders to act in the best interests of the company and with a high standard of ethics. Our business decisions should be made free from any conflict of interest and be impartial in appearance and fact. We must make our decisions based on sound business reasoning in line with our value of 'making smart decisions'. Conflicts of interest may occur when an individual's outside activities or personal interests conflict or appear to conflict with his or her responsibilities to Sappi. An outside activity can be considered a conflict of interest if it:

- Has a negative impact on our business interests
- Negatively affects Sappi's reputation or relations with others, or
- Interferes with an individual's judgment in carrying out his or her job duties.

Expected behavior

- We win business based on our outstanding products and services, rather than through the provision or acceptance of extravagant gifts or entertainment. There might be times during the course of your work when not accepting gifts or entertainment could cause offense. The question you need to ask yourself is "Could a reasonable person think the gift, entertainment or favor might influence your business judgment?" If the answer is "Yes", you must refuse it.
- Accurately record all your transactions and any gifts or entertainment you receive/provide using the disclosure channels provided.
- It's important to maintain objectivity when dealing with customers and suppliers and to ensure that your decision is not influenced by gifts, entertainment or favors that could:
 - ◆ Create a sense of obligation towards the customer/supplier
 - ◆ Prejudice Sappi's interests in favor of your own
 - ◆ Compromise your independence, or
 - ◆ Negatively influence your ability to pursue Sappi's best interests.
- You should report all actual or attempted instances of bribery and corruption of which you become aware.
- Any activity that has the appearance of a conflict of interest – whether or not an actual conflict exists – should be avoided.
- Declare and discuss any potential conflicts of interest with your manager and then take the appropriate action.
- You should never use your company position or influence to secure an improper benefit for yourself or others.

Practical examples

Q

Question: *Jo's father's company is trying to become a supplier of Sappi. As Jo works for Sappi does this create a conflict of interest?*

A

Answer: If Jo has decision-making authority and is responsible for requisitioning, purchasing or accepting work, a conflict of interest exists. Even if Jo does not have such authority, this relationship may create the appearance of a conflict of interest. Jo should report the situation to her manager using the company's normal declaration protocols. Jo should also remove herself from any decision-making processes involving her father's company.

Q

Question: *Anna's colleague, Pat, is a line operator who is responsible for conducting regular checks on product quality. Anna learns that Pat has not been conducting the required tests and has been falsifying his documentation. Should Anna notify her supervisor?*

A

Answer: Yes, Anna should notify Management immediately. Sappi's reputation is built on the quality of our products.

Q

Question: *In Zack's area, it is both typical and expected for suppliers to provide their clients with fairly expensive and lavish gifts. Because of this custom, Zack is finding it difficult to discourage our suppliers from providing these gifts.*

A

Answer: Zack should politely advise these suppliers that Sappi's Code of Ethics does not permit our employees to accept these gifts. Procurement Departments should look for opportunities to notify suppliers of these standards before problems arise eg at the beginning of the relationship or prior to the holiday gift-giving period.

Q

Question: *Thabo has developed a friendship with a supplier and is considering entering into a partnership with her in a business venture unrelated to Sappi's business. Does this create a conflict of interest?*

A

Answer: Yes, it could. Even if Thabo is able to keep his personal and financial dealings with his friend from affecting his judgement on behalf of Sappi, others may perceive that Thabo is biased. Before Thabo takes any action, he should disclose and obtain approval for these plans through the normal disclosure channels. He should also consider the general Sappi rules regarding being involved in other work as a full-time employee.

Where can I find further information?

- Read the [Sappi Group Prevention of Fraud and Corruption Policy](#).
- Call the Sappi Hotline in your region if you suspect corrupt behavior.
- Alternatively, speak to your line manager, your regional legal representative or your regional internal auditor.



Insider trading

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Insider trading is defined as buying or selling shares, or advising others to buy or sell shares, based on material, non-public information. This type of trading takes unfair advantage of privileged information, putting the average investor at a disadvantage and violating the market principle of transparency.

Information is considered publicly available (or in the public domain) only when it has been released to the public through appropriate channels (such as a company media release or public stock exchange filings) and the investing public has had sufficient time to absorb and evaluate the impact.

Expected behavior

- Do not trade in Sappi shares during closed periods and do not ask others to trade on your behalf.
- If you are a director (or on the lead teams of Sappi Limited or any subsidiaries and operating companies) ensure that any trade in Sappi shares is made known to the Group Company Secretary.
- Do not share any confidential or proprietary information such as information about unpublished financial results, new products, and acquisition plans or strategies that have not yet been made public to third parties. This principle also applies to family members and relatives.
- Be careful to not create the impression that you are giving investment advice when explaining Sappi's performance or financial results to anyone.

Practical examples

Q

Question: Sam has access to actual quarterly financial results. Can she tell friends or family of the positive or negative quarter Sappi just had?

A

Answer: Not before the results have been published through the Johannesburg Securities Exchange where Sappi's shares are listed. Until then, the results are confidential. If Sam's family or friends trade in Sappi shares before the results become public (and they did so based on information or comments they received from her) they will be violating insider trading legislation.

Q

Question: Adam would like to help a local charity boost their investment portfolio. Adam has knowledge of a new Sappi innovation that will most likely boost our share price. Can Adam give a tip to the charity?

A

Answer: No, although Adam has good intentions, he cannot share this material non-public information. If Adam does so, and the charity buys shares based on this information, Adam and the charity may be liable for violating insider trading legislation.

Where can I find further information?

- Read the [Sappi Group Trades in Sappi Limited Securities Policy](#).
- Read the Sappi Group Investor Relations Policy.
- Please contact the Group Company Secretary on +27 (0)11 407 8072 or the Group Head Investor Relations and Sustainability on +27 (0)11 407 8391.



Competition law

Fair competition is an essential element in the efficient working of markets. It brings important benefits to the economy by encouraging enterprise, innovation, efficiency and expanding choice. Antitrust laws – also referred to as ‘competition laws’ – are designed to protect consumers and companies from collusion by ensuring that fair competition exists in an open market economy.

The consequences to Sappi for non-compliance with antitrust laws are significant and non-compliance results in serious financial fines, reputational harm, private damage claims and potentially criminal penalties being imposed on company employees. Potential infringements of antitrust laws are the single most important legal risk for Sappi.

Expected behavior

Do not join Sappi’s competitors or business partners in agreements or understandings that limit competition. These might include:

- Fixing prices (this include the actual price or any increases or any charges related to the product)
- Joint establishment of discounts/rebates, or
- Dividing product markets, territories or customers (eg “We’ll stay out of your market if you stay out of ours.”)

Industry meetings are today arranged so as to avoid any allegations of parties meeting to collude and agree on anticompetitive behavior. However, care should always be taken in any meeting that includes industry players. You should report any attempted or actual anticompetitive behavior to your regional Legal Department.

Practical examples

Question: *Mary’s friend Ron works for one of Sappi’s competitors. Ron mentions that his company is planning pricing increases and implies that if Mary could get Sappi to increase its prices for a certain range of product, Ron’s company would do the same. What should Mary do?*

Answer: Mary should tell Ron that this discussion could be perceived to be price-fixing and that she cannot engage further on this matter. Price-fixing is illegal and can have serious consequences for the companies involved. Mary should promptly report the conversation to her Legal Department.

Question: *John, who works for Sappi, is approached by Penny, who works for a competitor. Penny asks John whether Sappi intends to put in an offer for tenders issued by two particular clients and suggests that John should put in a higher offer than Penny for customer A in order for Penny to get customer A’s contract and she will put in a higher offer than John for customer B in order for John to get customer B’s contract. What should John do?*

Answer: John should tell Penny that this discussion could be perceived to be collusive tendering and/or customer allocation and that both companies could be breaking the law, and refuse to enter into any such agreement. John should also report the conversation to his Legal Department.

Where can I find further information?

- Read the [Sappi Group Competition Law Policy](#).
- Consult the Legal Department in your region.



Political affairs, sensitive payments and donations

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In the course of doing business around the world, Sappi interacts regularly with government officials. How we conduct ourselves with governments and in the political arena can affect our reputation, our operations around the world and our ability to work with government officials and other stakeholders, many of whom are responsible for issuing licences for our operations or regulating our activities. In all instances, it is imperative for employees to seek proper guidance and obtain the required approvals before embarking on government or political stakeholder engagement activities on behalf of Sappi.

Sappi does not seek to unduly influence public decisions, and in line with our policy of non-discrimination and inclusivity, cannot single out and support specific political or religious groups.

No political contributions of the funds of Sappi Limited or any of our subsidiaries are to be made, directly or indirectly, to candidates for political office or to political parties or committees in any country.

Bribery of any government official in any country is strictly against Sappi policy, even if the refusal to make such a payment would result in our losing a business opportunity. Sappi employees (and business partners engaged on Sappi business) are prohibited from making payments or providing anything of value to government officials with the intent to improperly influence the performance of their official duties or gain any other improper advantage.

Expected behavior

- Do not contribute Sappi resources to any political or religious groups.
- Employees may not engage in personal political activities during paid working hours or when using company resources (such as eMail, telephone and meeting rooms) without receiving pre-approval from their direct managers.
- Obtain approval before giving any gifts (directly or indirectly) to government officials or employees.

Practical examples

Q
Question: *Karen works in logistics. Border officials can misuse their position to delay shipments or impose unwarranted penalties. Karen knows that in order to avoid this and expedite the process she can make modest expediting payments to these government officials. Can Karen make such payments?*

A
Answer: No, such 'facilitation' payments would likely violate local and other antibribery and corruption laws.

Q
Question: *Zara uses her Sappi eMail account to solicit votes for her husband who is running for local political office. Is this acceptable?*

A
Answer: No. Company resources may not be used for political purposes.

Practical examples (continued)

Q

Question: *Sipho is a marketing director and recently learned about an agent who can assist Sappi in obtaining business in a country where it has been difficult for us to become established and to obtain the necessary local government permits and licences. Can Sipho engage this agent on behalf of Sappi?*

A

Answer: Before Sipho engages the agent, Sipho needs to undertake proper due diligence to ensure that the agent is reputable and that its business methods are in line with local and relevant global legislation. Appropriate contractual arrangements should be made and monitoring processes implemented. This is critical because Sappi could be held liable for the acts of the third party.

Q

Question: *A faith-based group is fundraising money for victims of a natural disaster who are helped irrespective of their religion. Franco knows that Sappi does not contribute to political or religious groups. Can an exception be made in this case?*

A

Answer: Yes. In this instance Sappi might consider donating money to the disaster relief fund because the fund will not be targeting a specific religious group and the purpose of the fund is disaster relief.

Where can I find further information?

- Read the sensitive payments section of the [Sappi Group Prevention of Fraud and Corruption Policy](#).
- Read the [Sappi Group Stakeholder Engagement Policy](#).
- Read the [Sappi Group Corporate Social Responsibility Policy](#).
- Consult the Legal Department in your region.
- Contact the Group Head Corporate Affairs on +27 (0)11 407 8044.



Use of company assets, people, resources and time

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All Sappi's assets, from computers and machines to intellectual property such as a patent or trade mark, are essential tools for our success. Misuse of these assets could negatively impact our business and/or our reputation. We need to be good stewards of the assets we use every day and accept personal responsibility for the proper use of the company assets in our care.

Expected behavior

We should all:

- Use assets such as company vehicles and computers properly (with care and respect) and legally, for company purposes, and (where applicable) for authorized personal use
- Comply with company policies, including IT and communication policies (such as electronic communications; media; social media)
- Work according to the highest standards of service and delivery
- Ensure the effective and efficient use of company time – time for which we are considered to be at work and for which we are being paid
- Complete tasks and projects cost-efficiently and in the shortest reasonable time frames, and
- Continuously seek better and more efficient and effective ways of performing our work.

Practical examples

Q

Question: Hannes uses a company laptop computer when travelling. What precautions should Hannes take?

A

Answer: Apart from the cost of the asset, laptop computers may contain confidential company information. Hannes must try to keep the laptop computer secure at all times. Hannes should not check the laptop in at the airport nor should Hannes leave it in any unsecured place eg a car.

Q

Question: Whenever Marie needs to find her colleague Mike to go over a work project, Marie finds Mike on a smoke/coffee/Internet leisure break. It seems like Mike takes many such breaks a day. What should Marie do?

A

Answer: We must use our time at work to focus primarily on Sappi business. Mike is not respecting Sappi's policies on effective use of time and working hours. If such breaks are excessive and leisurely in nature, such behavior is inappropriate and undermines morale. Marie should address her concerns with her colleague (if she is comfortable doing so), or with her manager or with someone in the Human Resources Department.

Practical examples (continued)

Q

Question: Jenny uses her company computer for online banking. Is this appropriate?

A

Answer: Yes. Employees can use the Internet for appropriate personal tasks as long as the activity is infrequent and insubstantial and does not interfere with an employee's job performance.

Where can I find further information?



- Read the Sappi Group Classification and Management of Electronic Information Policy.
- Read the regional human resources policies on Sappi Net relating to the applicable topic.
- Consult the various policies on the Sappi Net (including the Sappi Group Media Engagement Policy and Sappi Group Social Media Policy as well as the Sappi Group Internet Usage Policy and the Sappi brand and corporate identity guidelines).
- Speak to your line manager, Human Resources- or Legal Department.



Privacy and confidentiality

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Sappi's information assets include both our records, systems and our intellectual property eg trade secrets and patents. We have a responsibility to safeguard our information assets and be discreet when handling sensitive or proprietary information.

Personal data is information that can directly or indirectly identify an individual, including employees, contractors, directors, shareholders, customers and anyone else with whom Sappi does business. The proper protection and use of personal data demonstrates respect and promotes trust.

Trust is an essential element of relationships. Our relationships with a broad range of stakeholders depend on building and retaining that trust. In the countries in which we operate, there are laws that govern how we collect, use and dispose of personal data.

Expected behavior

- We respect the confidentiality of personal data. This information may not be used or disclosed improperly or used by someone who is not authorized to do so.
- We safeguard Sappi's information assets and intellectual property against theft, unauthorized disclosure, or misuse.
- We use personal, supplier and customer data only to support our operations and to provide employee benefits and customer solutions.
- We have safeguards to protect personal and customer data and we expect all our employees and anyone else with access to this data to comply with these safeguards.
- We inform individuals about the collection and processing of their data, as well as their rights towards their personal data.
- We comply with all regulations and contractual commitments regarding the valid and enforceable intellectual property rights of third parties, including patents, copyrights, trade secrets and other proprietary information.

Practical examples

Q
Question: *Ella's friend who works for another company asked Ella to provide her with the contact details of some business contacts. Ella's friend's company does not compete with Sappi. Is it acceptable for Ella to give her the requested information?*

A

Answer: Business contact information is considered personal data because it can identify an individual. Personal data may not be shared with anyone except as required or with the permission of the individual. If Ella believes that her business contacts could benefit from the introduction to Ella's friend's company, she can either ask her business contact if he/she is comfortable with Ella sharing his/her contact information or Ella can pass along her friend's company information to her business contact.

Practical examples (continued)

Q

Question: *Nompu has been contacted by a journalist requesting information about the most recent financial results. Nompu has heard that the results are excellent and, knowing that the news will likely boost Sappi's share price, believes that she would be helping Sappi by passing on what she has heard. Should Nompu speak to the journalist?*

A

Answer: No. Nompu should refer the journalist to the Regional Communications Manager or to the Group Corporate Affairs or Group Investor Relations Departments. Nompu must not divulge what she has heard to the journalist. The information Nompu possesses may be incorrect or incomplete. Even if the information is correct, sharing it with the journalist may be inappropriate at the time and harmful to Sappi.

Q

Question: *Frederique has set up his personal mobile device so that he can check his Sappi eMail, calendar and contacts on it. Can Frederique disable the mobile passcode?*

A

Answer: No. Disabling the mobile device passcode will compromise the security of the mobile device and may expose Sappi eMail to others who should not have access to it.

Q

Question: *Karl overheard other Sappi employees discussing Sappi business at the gym. What should he do?*

A

Answer: If Karl believes that the information being discussed is sensitive or confidential, he should advise the parties that they can be overheard. Every employee has a responsibility to ensure that confidential and proprietary information is not disclosed in public.

Where can I find further information?

- Read the Sappi Group Social Media Policy.
- Consult the Communications Department in your region.



Personal conduct on social media

Communication

Given that social media is still developing and maturing, our Group Social Media Policy will be updated on a regular basis to ensure that the company's interests and reputation are protected.

Social media platforms are no different to any other form of communication and the same due care and diligence must be taken when using them. What distinguishes social media from other communication platforms is that it is instant and can reach a very large audience very quickly. The consequences of a mistake or ill-considered remark therefore have the potential for greater (and quicker) damage to the individual and the company's brand and reputation compared to other forms of communication. It is also very difficult to remove such social media comments or posts or prevent their distribution even after they may have been deleted.

Even when communicating in your personal capacity, you should consider the possible consequences of statements or comments which can cause offense.

Expected behavior

- Refrain from excessive use of social media during work time or on company equipment, unless it is work related as authorized by the relevant policy.
- Internet postings may not include Sappi's logos or trade marks and must comply with copyright, privacy, fair use, financial disclosure and other applicable laws.
- Be smart about protecting yourself, your own and others' privacy, and Sappi's company profile and reputation.
- The Internet is not anonymous, nor does it forget. What you publish on social media sites is widely accessible and likely to be available for a long time, so please be sure to consider the content carefully before posting material on the Internet.

Practical examples

Question: *Leola was using her own computer and came across a blog where confidential Sappi information was been divulged. What should she do?*

A **Answer:** Such disclosure of confidential information is strictly forbidden. Discuss your observation with your manager and notify the Group Corporate Affairs Department.

Question: *Chan regularly visits Internet chat rooms whilst at work. Is this appropriate?*

A **Answer:** No. Unless Chan is specifically authorized to visit Internet chat rooms as part of his job responsibilities, it is inappropriate for him to spend time in Internet chat rooms using Sappi computers during working hours. If he wishes to chat online, he should do so using his own personal computer and in his own time.

Where can I find further information?

- Read the Sappi Group Social Media Policy.
- Read the [Sappi Group Human Resources Policy](#).
- Consult the Communications Department in your region.

We comply with international trade laws

Free and fair trade allows companies to expand markets and trade globally, thereby adding value to stakeholders. As a global company, Sappi provides dissolving wood pulp, paper pulp, paper solutions and other value-added products to customers in more than 100 countries. Our ability to do so depends on compliance with the laws and regulations associated with cross-border trade.

Expected behavior – we must:

Follow and comply with the trade laws of countries where we conduct business, including legislation and international resolutions concerning:

- Importing or exporting specific goods, services or technology
- Prohibiting transactions with specific countries, entities or people (for example United Nations sanctions)
- Government approval, licences or other requirements necessary to complete a transaction or sale, or
- Product labelling.

Understand which countries or people we may not do business with because of sanctions or other restrictions.

Engage companies and business partners who agree to obey international trade laws.

Practical examples

Q

Question: Morgan works in sales and was recently contacted by a foreign company that wishes to buy Sappi products. The prospective customer is headquartered in a country in which Sappi has never done business. What should she do?

A

Answer: Before entering into any business with the prospective customer, Morgan should first do his due diligence to ensure that Sappi will not be doing business with a country or organization that is the subject of any legally imposed sanctions.

Where can I find further information?

If you have questions or concerns about international trade laws, talk to a representative from the Legal Department in your region.

All relevant policies can be found on either Sappi Net <http://sappinet.za.sappi.com/policies> (for employees) or on our website <http://www.sappi.com/policies>.



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