

Group Stakeholder Engagement Policy

This policy supports Sappi's Group Sustainability Charter and our approach to sustainable development.

Our approach to sustainability is based on a holistic view of Prosperity, People and Planet (the 3Ps).

Being a sustainable organisation means that we balance and integrate the 3Ps into our business decisions, strategies and processes to help us add more value for all our stakeholders. Our strong sustainability governance structure is underpinned by our commitment to living our value statement: *At Sappi we do business with Integrity and Courage; making Smart decisions which we execute with Speed. Our values are underpinned by an unrelenting focus on and commitment to safety.*

Our commitment to inclusive stakeholder engagement is based on the principles of:

Relevance — focusing on those issues of material concern to our stakeholders and to Sappi and identifying how best to address them for our mutual benefit.

Completeness — understanding the views, needs, performance expectations and perceptions associated with these material issues while also taking cognisance of prevailing local and global trends.

Responsiveness — engaging with stakeholders on these issues and giving regular, comprehensive, coherent feedback.

We define the following broad stakeholder groups across the Sappi group and engage with them in the following ways:

Employees

- Measure employee engagement on an ongoing basis and report the results and actions taken both internally and externally as relevant.
- Ensure employees are informed of and can contribute to their unit's business strategy and performance, as well as groupwide developments.
- Promote an understanding of and build alignment to the manner in which we integrate the 3Ps of sustainability into our everyday business processes.
- Provide the appropriate channels through which employees can make their concerns and grievances known.
- Encourage and motivate employees to contribute to Sappi's development and success outside their immediate job specifications.
- Encourage employees to take advantage of the training and development opportunities available to them.
- Drive commitment to and compliance with health and safety procedures through employee-centric programmes.

- Promote employee participation in wellbeing committees, as well as community focused initiatives and volunteer programmes.

Customers

- Engage with our customers and, where appropriate, their customers to better understand the markets in which they operate, their challenges and opportunities and the issues of relevance to us.
- Work with customers to arrive at value-adding solutions that give both them and Sappi a competitive edge in the marketplace.
- Further enhance our service offering by being easy and efficient to do business with.
- Provide customers with relevant information regarding fibre sourcing, production processes, as well as our overall environmental performance.
- Provide customers with easy-to-access, relevant technical information.
- Continue with initiatives that promote innovation in our customer segments.
- Measure, monitor and manage customer satisfaction.

Communities

- Act as responsive corporate citizens, sensitive to local needs.
- Proactively establish and utilise formal structures to engage with local communities and other relevant stakeholders on a structured, regular basis.
- Ensure communities are fully informed about operational developments that could impact them positively or negatively.
- Prioritise corporate social responsibility (CSR) activities to benefit communities close to our operations, after consultation to determine needs and priorities.

Investors (shareholders and bondholders)

- Provide timeous, comprehensive information that facilitates informed decisions.
- Maintain regular contact.

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Group Stakeholder Engagement Policy continued

Suppliers and contractors

- Ensure that suppliers and contractors understand their role in helping Sappi achieve business success.
- Encourage suppliers and contractors to uphold ethical, social, quality, health and safety and environmental standards consistent with our own and to obtain external quality, health and safety and environmental certification as appropriate.

Governments and regulatory bodies

- Build an understanding of Sappi's business and our contribution to the countries, regions and local communities where we operate, as aligned to government priorities and programmes.
- Engage with regulatory bodies to secure mutual understanding.

Industry bodies

- Support and enable the efforts of industry bodies and associations to promote and protect our interests.

Civil society

- Identify and build relations with relevant civil society bodies and organisations and identify opportunities to help one another achieve our mandates.
- Work together to resolve issues of mutual concern.

We require all our stakeholders to abide by the requirements set out in our Sappi Code of Ethics and to act in accordance with the Sappi value statement.

Going forward, we will continue to develop our manufacturing, human, social and natural resources in a way that ensures our sustainability approach enhances our long-term viability and overall Prosperity.

Steve Binnie
Chief Executive Officer
Sappi Limited