

Group Human Resources 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.*

By maintaining a safe, healthy workplace for our People in which diversity is valued, and people are provided with ongoing development opportunities so that they can develop to their full potential, we enhance productivity and our ability to service global markets. We commit to:

Reward employees fairly

- Compensating all our employees equitably, according to job level, skills, qualifications and performance, with reference to competitive industry and country conditions.
- Benchmarking our pay practices on an annual or biennial basis.
- Meeting or exceeding legal or industry minimum wages.

Create a healthy, safe working environment

- Ensuring a workplace with sound health, safety and environmental management practices.
- Meeting or exceeding applicable safety and environmental laws and regulations of the responsible governmental authorities wherever we operate.
- Ensuring that employee wellbeing remains fundamental to the way in which we work.

Ongoing employee development

- Creating an environment in which every employee is given the opportunity to realise their full potential.
- Providing learning solutions and opportunities that enable individuals, groups and the organisation to improve performance, learn new skills, adapt to change and meet groupwide business objectives.

Employee diversity

- Valuing diversity and promoting inclusion.
- Prohibiting discrimination based on race, gender, ethnicity, age, religion, sexual orientation, union membership, political affiliation, physical disability or HIV/AIDS status.

- Complying with legal obligations designed to redress historical issues of inequality within the framework of our overall approach to diversity.

Fair employment practices

- Complying with all applicable laws and industry standards on working hours and the minimum working age.
- Prohibiting the use of child (defined as people younger than 16) or forced labour within any of our business operations.
- Entrenching the right of all employees to due process in terms of disciplinary and grievance procedures.

Freedom of association

- Recognising the rights of our employees to associate freely and bargain collectively, consistent with regional laws and regulations.
- Maintaining constructive relationships with our unions and employee representative councils.

Ethical behaviour

- Requiring all employees to uphold national laws, abide by our Sappi Code of Ethics and act in accordance with our values statement.
- Upholding the 10 principles set out in the United Nations Global Compact.
- Supporting the observance of human rights as set out in the Universal Declaration of Human Rights.

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