



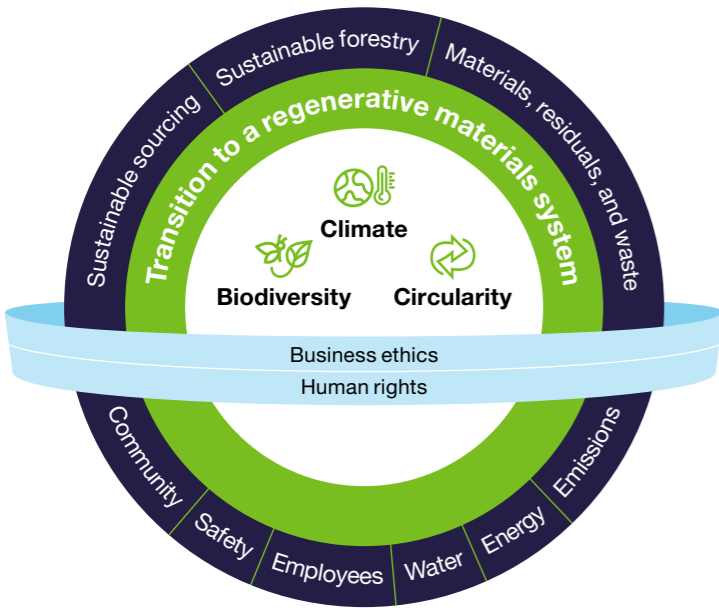
THE RENEWABLE MATERIALS COMPANY

Stora Enso Human Rights Guidelines

February 2024

Human Rights Guidelines

Respect for human rights is a core element of Stora Enso's social responsibility and foundation of our sustainability approach. Our human rights work is guided by international principles and standards, local regulation, and our company values.



Stora Enso sustainability framework



About the Human Rights Guidelines

These Human Rights Guidelines provide a comprehensive overview of the objectives defined in Stora Enso's Human Rights Policy and how we work to achieve those objectives. The guidelines also explain how we defined our most salient human rights issues, how they are addressed in our everyday work, and how they are kept up to date.

Policy objectives

In our Human Rights Policy, we outline our ambition and objectives for respecting human rights throughout our operations. In this section, we explain how the objectives are carried out in practice.

› Read more on page 3.

Salient human rights issues

We have defined most salient human rights issues that are the focus of our work. In this section, we explain how these human rights may be impacted by our operations.

› Read more on page 5.

1

Stora Enso's human rights policy objectives: committed to respecting human rights



Our contribution as the renewable materials company

When Stora Enso grows and harvests trees, produces renewable products, transports materials, or collaborates with suppliers, it has an impact on people. The United Nation's Guiding Principles on Business and Human Rights (UNGPs) highlight that companies have an ongoing responsibility to respect human rights, even where government actions and regulatory frameworks are inadequate. Compliance with these principles means that companies must conduct human rights due diligence to identify, assess, and remedy the human rights impacts of their operations, products, and services. Stora Enso is fully committed to adhere to the UNGPs.

Our policy objectives explained

1 Our human rights work is guided by international principles and standards, local regulation, and our company values of 'Lead' and 'Do what's right'.

Stora Enso is committed to respecting human rights throughout its operations and in all its relationships. Human rights in this context include, at a minimum, those rights set out in the International Bill of Rights¹, the core labour rights conventions of the International Labor Organization (ILO), and international agreements on the rights of vulnerable groups². We also observe the human rights-related principles of the UN Global Compact, relevant Children's Rights and Business Principles, and the OECD's Guidelines for Multinational Enterprises.

Stora Enso complies with all applicable local, national, and international laws, regulations, and voluntary commitments wherever we do business. Stora Enso supports human rights regulation that puts companies on an equal standing and helps to ensure that rightsholders are treated with decency and respect.

Compiling with laws and regulations is only the starting point for Stora Enso. With our company values – Lead and Do What's Right – we endeavor to set the example. Stora Enso's code of conduct – the Stora Enso Code – is a guideline for all our employees that explains our approach to ethical business practices, human and labour rights, as well as environmental values. The Code guides Stora Enso's work and is applied wherever we operate.

2 We take human rights into account across our operations from investment decisions onwards, paying special attention to vulnerable groups, and encourage our partners to do the same.

We require that human rights risks and impacts are taken into account throughout our operations, including investment decisions related to mergers, acquisitions, and divestments. Our investment guidelines stipulate that environmental and social risks and impacts, including those related to human rights, must be duly identified, assessed, and addressed prior to approval in projects with business-critical risks. We pay special attention to the human rights of groups at heightened risk, such as children, women, migrant workers, and indigenous peoples.

We encourage our partners to constantly improve their human rights performance by clearly communicating our values and expectations to them. This can be done using methods, such as contractual requirements or cooperating to address any challenges the partner may be facing.

3 We engage with affected and potentially affected stakeholders to ensure that our approach and focus are valid.

We engage with potentially affected people and/or their representatives on a regular basis to identify any needs for updating our priorities, policies, and practices. This includes, for example, visiting local communities; consulting with communities prior to any planned actions, such as harvesting operations; organising "open house" events at our units; consulting stakeholders when updating documents that affect them; and having an open dialogue with labour unions. Furthermore, our employees have the opportunity to express their perspectives on the company's performance as an employer through our annual employee survey.

¹ The International Bill of Rights consists of the Universal Declaration of Human Rights; the International Covenant on Economic, Social and Cultural Rights; and the International Covenant on Civil and Political Rights.

² Including but not limited to the Indigenous and Tribal Peoples Convention (C169); the Convention on the Elimination of Discrimination Against Women (CEDAW), Convention on the Rights of the Child (UNCRC), the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CRMW).

4 We remedy situations where our activities have caused or contributed to an adverse human rights impact and engage with affected stakeholders in finding the best solutions. We do not obstruct the access of affected stakeholders to other remedy initiatives.

Stora Enso is committed to remedy situations where our activities have caused or contributed to adverse human rights impacts. Where violations are committed by third parties with links to Stora Enso through our operations, products, or services, we strive to use our influence together with relevant stakeholders to ensure that those impacts are remedied. The best solutions are dependent on the needs of the affected people and the details of the case, which is why we engage with affected stakeholders and/or their representatives to find those solutions.

We collaborate with other remedy initiatives and do not obstruct the access of affected stakeholders to these initiatives.

5 We work to raise awareness on human rights in our organisation, conduct human rights due diligence, and report on our human rights performance.

All our employees are required to complete the Stora Enso Code training, which includes a section on human rights. We aim to ensure that our new employees complete this training within their first month of employment. In addition, we provide human rights training in various forms as required by the employee's tasks, including security personnel, purchasers, and other personnel in positions that require interaction with external stakeholders. Labour rights training is also included in our human resources processes.

We use a range of tools to conduct continuous human rights due diligence of our operations. These tools include monitoring compliance with our policies, requirements, and guidelines; ensuring that our grievance mechanisms are operating effectively and are accessible to all relevant stakeholders; engaging and consulting with affected people or their representatives; and conducting project-specific impact assessments.

Stora Enso reports on its human rights work annually and strives to align its reporting with the UNGP reporting framework. We also publish an annual Slavery and Human Trafficking Statement. We follow developments in national and regional legislation to ensure we are compliant with all regulation.

6 We require our suppliers to respect human and labour rights and comply with our policies and guidelines.

The Stora Enso Supplier Code of Conduct (SCoC) is the cornerstone of our approach to responsible sourcing. It is a legally binding document that imposes sustainability requirements on our suppliers concerning human and labour rights, occupational health and safety, environmental commitments, and responsible business practices. The SCoC applies to all our sourcing categories globally.

7 Where national human rights laws differ from international human rights laws or standards, we comply with those laws or standards that are most favourable to the rights-holder.

Where local laws or regulations differ from the Stora Enso Code, we must make sure that we meet both standards. In our own operations, we are committed to applying the standard that is most beneficial to the employee. For example, in markets where (private) unions are not allowed, we seek to facilitate other forms of worker representation.

In our supply chain, if there are differences between the requirements of regulation and those of Stora Enso's Supplier Code of Conduct (SCoC), or between the supplier's own code of conduct and our SCoC, the supplier must adhere to whatever is stricter.



Prioritising human rights



As a global company, Stora Enso directly impacts approximately 19,000 forest owners, 21,000 employees, over 20,000 suppliers and thousands of customers. Through family, friends, and communities, we have an indirect impact on even more people. With a sphere of influence this extensive, it is essential that human rights are respected throughout our value chain. While we respect and consider all human rights important, we focus our human rights work on those human rights issues on which our operations can have the most severe impact.

Stora Enso respects all human rights established in the International Bill of Human Rights, and we are committed to implementing the United Nations' Guiding Principles on Business and Human Rights. Of the rights included in these documents, we have identified those rights that are relevant to the forest products sector; and those that are at risk of being most severely impacted by our own operations, products, or services.

We call these rights Stora Enso's most salient human rights issues and they are the focus of our due diligence. Those human rights relevant to the forest products sector, but not of highest priority to Stora Enso, are integrated into our existing management systems.

Our salient human rights issues are:

- Health and safety
- Fair labour
 - Fair employment conditions
 - Freedom from forced labour
 - Freedom of association
 - Non-discrimination and non-harassment
- Acquisition and management of rights to land and natural resources
- Access to grievance mechanisms
- Children's rights.

Defining and updating our salient human rights issues

Stora Enso's highest priority human rights were defined and approved in 2018 by our internal experts with support from the non-profit BSR. The selected rights were reviewed by key external stakeholders and confirmed by our Group Leadership Team (GLT). Geographically, our biggest potential impact on these rights is in countries where we employ large groups of people, either directly or through joint operations or contractors. These countries include, for example, Finland, Sweden, China, Poland, and Brazil. In addition, we have identified high-risk sourcing categories, where our salient human rights issues may be impacted through our supply chains. These categories include recycling services, land and sea transportation services, and wood supply functions.

We continuously monitor developments that may affect our human rights policies and practices through both internal dialogue and active engagement with external organisations. We follow international policy development closely; engage with partners throughout our value chain to understand what is driving change within their organisations; and interact with external experts to stay updated with the latest developments and to seek advice when needed. We also engage with potentially affected people and/or their representatives on a regular basis, as defined in our Human Rights Policy objective #3.

Any findings related to human rights are followed up by action plans to address the findings directly or to improve related processes. These actions are developed and carried out together with the relevant functions and divisions. This is to ensure that the actions are integrated into mainstream decision making and activities, and that they are controlled and monitored. Our enterprise risk management also factors in human rights. When evaluating the effectiveness of actions taken, we rely on our internal monitoring and reporting on compliance, performance, and lead indicators.

Salient human rights issues

Health and safety

We strive to ensure that all employees, on-site contractors, and our wider workforce return safe from a healthy workplace every day; and to ensure that the health and safety of community members or on-site visitors is not adversely impacted by our operations or by those of our suppliers.

What is it?	Why is it a priority to Stora Enso?	How do we address it?	Read more
<p>This commitment covers the rights to life and health of our employees, site visitors, contractor employees, and community members. It includes both industrial aspects, such as safe and healthy workplaces, and occupational aspects, such as workplace health.</p>	<p>We operate various mills where heavy machinery, chemical use, and emissions may present safety hazards to operating and surrounding people if not managed correctly. This could have impacts on occupational safety, wellbeing, and access to safe and healthy air, water, and soil.</p>	<p>Stora Enso's goal is to provide an accident-free workplace. We aim to provide a transparent process to managing safety; facilitate the review and discussion of unsafe behaviour; and create a blame-free working environment. We also encourage everyone to give feedback and provide ideas on how to further improve safety.</p>	<p>› AR Safety</p>
	<p>The way we use land for our forestry and plantation operations may impact the rights of local communities.</p>	<p>We promote safety among our contractors and suppliers through a dedicated e-learning and ask suppliers for information on their safety performance in our tendering process.</p>	
	<p>We manage harvesting operations where heavy machinery may present safety hazards to operating and surrounding people if not managed correctly. This could have impacts on a healthy and safe living environment, including road safety and other contractor operations.</p>	<p>We assess and address our socio-environmental impacts on local communities to minimise negative impacts, maximise our positive influence, and maintain a constructive community dialogue that ensures our long-term license to operate.</p>	<p>› AR Community</p> <p>› AR Materials, residuals and waste</p> <p>› AR Water</p> <p>› AR Energy</p> <p>› AR Climate change: emissions</p> <p>› Environmental Guidelines</p>
	<p>We depend on the logistics of heavy goods, such as wood, which may impact the safety of anyone working at our units, including contractor employees, or operating the vehicles.</p>	<p>We apply precautionary management actions to mitigate and remedy potential adverse impacts on the environment and people. We actively reduce the energy intensity of our operations – and in many places also our dependency on fossil fuels.</p>	
<p>Vehicles transporting our goods may also impact the safety of people onboard or those traveling in the vicinity of the vehicle.</p>	<p>Suppliers While contractors are primarily responsible for their own employees, we strive to ensure that everyone working on our premises receives adequate safety training.</p>	<p>› AR Sustainable sourcing</p>	

AR = Annual report

Salient human rights issues

Fair labour

We strive to ensure fair employment conditions for all employees, on-site contractors, and our wider workforce. We always comply with applicable internal policies, national and regional legislation, relevant Collective Bargaining Agreements (CBAs), and international human rights standards. For Stora Enso, this human rights priority includes the rights to **fair employment conditions, freedom of association, as well as freedom from forced labour, discrimination, and harassment.**

What is it?	Why is it a priority to Stora Enso?	How do we address it?	Read more
<p>This commitment seeks to respect the rights of our employees, on-site contractors, and our wider workforce to:</p> <ul style="list-style-type: none"> • Family life • Rest and leisure • Reasonable remuneration • Premium payment for overtime • Social security • Freedom of association and collective bargaining • Not be subjected to slavery, servitude, or forced labour • Freedom of movement • Non-discrimination • Security of the person • Not be subjected to torture, cruel, inhuman, or degrading treatment. 	<p>As an employer, we have an impact on the working conditions of our own employees and those of our suppliers and contractors.</p>	<p>Fair employment conditions: As set in our <i>Minimum Human Resources Requirements</i> for labour conditions, the <i>Global Framework Agreement</i> that we have signed with three global labour unions, and our <i>Supplier Code of Conduct</i>, we seek to ensure that all our employees and those of our contractors and suppliers have:</p> <ul style="list-style-type: none"> • A clearly understood employment status and written contract • Reasonable working hours and adequate rest time • Reasonable remuneration • Premium payment for overtime • Paid holidays • Social security benefits. 	
	<p>Freedom from forced labour: While we recognise that modern slavery-related risks may exist in our own operations, we have determined that the greatest risk is in our complex and extensive supply chains. Recycling services, land and sea transportation services, and wood supply functions have been identified as having heightened risk for modern slavery in our sector. Based on an in-depth internal evaluation, we have identified China, Poland, and the Baltic countries as our highest risk markets for forced labour within these sourcing categories.</p>	<p>We strive to prevent and eliminate all forms of forced labour in our operations and supply chains, including modern slavery, child labour and debt bondage. We have taken a risk-based approach to addressing modern slavery by focusing our efforts on our supply chains.</p>	<p>› Slavery and Human Trafficking Statement</p>
	<p>While we mostly operate in societies where the freedom of association and collective bargaining is protected by legislation, we also have operations in areas where these rights are not always fully respected.</p>	<p>We respect the right of all workers to freedom of association, including joining or not joining associations and trade unions, and collectively bargain with the company. Where needed, we seek to facilitate other forms of worker representation. This commitment also includes respecting the right to be free from retaliation regardless of the worker's freely-made decision. To strengthen this commitment, we have signed a Global Framework Agreement with three labour unions.</p>	<p>› AR Employees › AR Human rights</p>
	<p>Everyone has the right to feel safe, included, and respected at work. We have zero tolerance against discrimination and harassment of any kind. Yet we receive reports of such behaviour through grievance channels.</p>	<p>We do not tolerate discrimination against anyone based on their ethnicity, age, gender identity, disabilities, sexual orientation, religious beliefs, political opinions, family status, social origins, or other such characteristics. This includes the prevention and addressing of discrimination during recruitment, employment, and termination processes.</p> <p>We do not tolerate any form of harassment, including unwelcome or unwanted physical, sexual, psychological, or verbal conduct that would be considered intimidating, hostile, or offensive. We run awareness raising campaigns about harassment and encourage our employees to speak up when they witness or experience it.</p> <p>In addition, we require that our suppliers and contractors provide fair employment conditions to their employees.</p>	<p>› AR Sustainable sourcing › Stora Enso's Supplier Code of Conduct</p>

Salient human rights issues

Acquisition and management of rights to land and natural resources

We strive to ensure that the acquisition and management of the rights to use land and natural resources, connected to our operations and supply chains, are done respecting the rights of stakeholders.

Land and natural resources rights must be **acquired** only through an adequate process of due diligence of the right to property or natural resources. This includes avoiding the involuntary removal of indigenous peoples from the lands and natural resources that they traditionally occupy or use.

Land and natural resource **management** must respect the rights to life, health, and adequate standard of living of communities affected by our business activities. This requires that the adverse impacts on soil, air, water, and ecosystem services relied on by communities are prevented, mitigated, or remedied. Decommissioning or divestment processes must avoid, mitigate, or remedy consequent human rights impacts.

What is it?	Why is it a priority to Stora Enso?	How do we address it?	Read more
<p>This commitment seeks to respect the rights to:</p> <ul style="list-style-type: none"> • Safe and healthy living environment and natural resources, including air, water, and soil, in adequate quality and quantity. • Own property alone or in association with others • Self-determination of peoples through the free pursuit of their economic, social, and cultural development, • Water and sanitation for domestic and livelihood purposes • Adequate standard of living • Participate in cultural life, • Freedom of assembly and peaceful protest 	<p>Stora Enso is one of the biggest private forest owners in the world. We also manage vast areas of forests and plantations. At the end of 2023, Stora Enso owned or leased lands covering a total area of 2.02 million hectares.</p> <p>Using forests or land for tree plantations may impact the human rights of local communities, forestry workers, and forest owners.</p> <p>Stora Enso recognises that the areas where we operate are of value to different stakeholders, and that our operations may have an impact on the ways they are accustomed to using those areas.</p>	<p>Maintaining good dialogue with affected people helps to ensure that they feel heard and that their rights are respected. For example, we engage with potentially affected communities, forest owners, and/or non-governmental organisations when planning and conducting harvesting operations to ensure that all parties agree on our approach.</p>	<ul style="list-style-type: none"> › AR Community › AR Human rights
		<p>The form and frequency of our engagement with local communities is shaped by the local context. Many of our employees live in the communities and have a deeper understanding of the local context.</p>	<ul style="list-style-type: none"> › AR Community › Environmental Guidelines
		<p>We have adopted an integrated approach to land use around our plantations. This includes applied integrated land use models in Uruguay and Brazil to benefit local farmers and communities as well the company.</p>	
		<p>Community consultations, including Free, Prior, and Informed Consent (FPIC), are a key element in our human rights due diligence and forestry operations, especially concerning land leasing and indigenous peoples' rights. In Central Sweden, for example, we have had special agreements on land use with five Sámi communities since 1992 and continue to maintain good relations with them.</p>	
		<p>We also follow relevant forest certification requirements on identifying and upholding indigenous peoples' legal and customary rights.</p>	

Salient human rights issues

Access to grievance mechanisms

We strive to ensure access for all employees, on-site contractors, our wider workforce, and external stakeholders to confidential grievance mechanisms and effective forms of justice and remedies.

What is it?	Why is it a priority to Stora Enso?	How do we address it?	Read more
<p>This commitment seeks to respect the right of our internal and external stakeholders to access an effective remedy in cases where we have caused or contributed to impacts on their human rights.</p>	<p>To successfully prevent, address, and remedy human rights impacts, and risks thereof, we must be aware of them. Ensuring that all our stakeholders know how to report such impacts to us helps us identify permeating issues across our operations and to act on them.</p> <p>Grievance channel accessibility is also a requirement of the UN Guiding Principles on Business and Human Rights that we seek to fulfil.</p>	<p>We encourage our employees to report any suspected cases of misconduct or unethical behaviour to their manager, local human resources, or responsible internal units.</p> <p>We use an external service through which our employees, contractor employees who regularly work on our premises, and external stakeholders can anonymously report potential noncompliance cases online or by phone or mail. To ensure that all stakeholders are aware of this grievance channel and know how to use it, we promote it at various contact points through different communications activities.</p> <p>Our operation in China has established an internal grievance channel in local languages for stakeholders with inadequate knowledge of the main language. Our joint operations Veracel in Brazil and Montes del Plata in Uruguay also have their own local grievance mechanisms.</p>	<p>› AR Business ethics › AR Human rights</p>

Salient human rights issues

Children's rights

We strive to respect children's rights, in accordance with the relevant Children's Rights and Business Principles.

What is it?	Why is it a priority to Stora Enso?	How do we address it?	Read more
<p>This commitment seeks to respect the additional human rights of individuals below 18 years of age to special protection. Stora Enso has identified a subset of the Children's Rights and Business Principles³ that are particularly relevant to the forest products sector.</p>	<p>Our operations may impact children's rights just as they may impact any other human rights mentioned in this document. For example, the impacts that our operations may have on the environment, may impact the health and safety of children as they would those of adults.</p> <p>But as children are dependent on the conditions and decisions of adults, they are a vulnerable group that should be paid special attention to.</p> <p>Stora Enso's operations may impact the working conditions of parents and caregivers, which, in turn, may impact the lives of the children they provide for.</p> <p>Our marketing and communications may use imagery of children. This requires careful consideration for the protection of the privacy and decency of the children depicted in the imagery.</p>	<p>We contribute to the elimination of child labour in all activities and business relationships. For example, our suppliers are encouraged to have robust age verification procedures and records in place to ensure that no underage persons work in their operations.</p> <p>We ensure decent work for young workers, parents, and caregivers. For example, our <i>Minimum Human Resources Requirements</i> for labour conditions outline our requirements for the working conditions of our employees. We are also committed to the terms and conditions of the <i>Global Framework Agreement</i> that we have signed with three global labour unions. Our <i>Supplier Code of Conduct</i> places similar requirements on our contractors and suppliers.</p> <p>We strive to ensure the protection, health, and safety of children in all operations and activities. For example, we carefully consider and prevent or minimise potential impacts on children's rights due to environmental impacts or the acquisition and management of rights to land and natural resources.</p> <p>We strive to ensure that our marketing and communications respect children's rights. For example, Stora Enso's <i>Guidelines for using images of children</i> outline our requirements for aspects to be considered when using images of children or organising photoshoots that involve children.</p>	<p>› Engaging with vulnerable groups</p>

³Principles 2, 3, 4, 5, 6, and 7. See all principles here: <http://childrenandbusiness.org>.

Appendix

Glossary of terms

Affected people – Individuals whose human rights have been or may be affected by a company's operations, products, or services.

Collective bargaining – The process of negotiation between employers and a group of employees aimed at agreements (Collective Bargaining Agreements, CBAs) to regulate working salaries, working conditions, benefits, and other aspects of workers' compensation and rights for workers.

Decommissioning – The formal process of removing something from an active status. In business, this can mean, for example, retiring a mill or similar physical facilities.

Due diligence – An ongoing risk management process in order to identify, prevent, mitigate, and account for how to address adverse impacts on human rights stemming from company activities or which may be directly linked to company operations, products, or services by a business relationship. Includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.

Enterprise risk management (ERM) – The process of evaluating and addressing risk to a company's operations. Integrating human rights into ERM processes means that the company is also evaluating and addressing the risk of impacts its operations may have on people.

Free, Prior, and Informed Consent (FPIC)

– A specific right of indigenous peoples that is recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Allows indigenous peoples to give or withhold consent to a project or development. The aim is to establish bottom-up participation and consultation prior to the beginning of a project or development that takes place on ancestral land or uses resources within the indigenous population's territory.

Indigenous peoples – The existing descendants of the peoples who inhabited the present territory of a country wholly or partially at a time when persons of a different culture or ethnic origin arrived there from other parts of the world (based on a definition used by the UN Working Group on Indigenous Peoples).

Joint operation – A joint operation is such that is jointly owned by more than one owner. Stora Enso, for example, has two 50%-owned joint operations in South America. Both run a pulp mill and eucalyptus tree plantations.

Reasonable remuneration – In this context, refers to the reasonable compensation, or payment of wages, to employees for their work, considering the circumstances of the employment and local context.

Remedy – The process of making a poor situation or a negative impact better or right. Access to effective remedy is a core concept of the UNGPs. The definition of effective remedy depends on the needs of the affected people and on the details of the case.

Rights-holder – A person who, in a specific context, has rights that need to be considered in that context.

Severe impact (severity) – A negative human rights impact that is severe by virtue of one or more of the following: scale, scope, or irremediability. Scale means the gravity of the impact on the human right(s). Scope means the number of individuals that are or could be affected. Irremediability means the level of difficulty with which impacted rights could be made better or compensated for.

United Nations' Guiding Principles on Business and Human Rights (UNGPs) – A set of 31 principles that set out the respective roles of States and companies in ensuring that companies respect human rights in their business activities and through their business relationships. The UN Guiding Principles were endorsed by the UN Human Rights Council in 2011.

