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UPM ANTI-BRIBERY RULES FOR SUPPLIERS

These anti-bribery rules for suppliers are a summary of anti-bribery rules of UPM-Kymmene Corporation that were adopted by the Group Executive Team of UPM-Kymmene Corporation on 26 July 2013. These rules apply to suppliers of UPM.

1 PROHIBITION OF CORRUPTION AND BRIBERY

The direct or indirect payment, offer, arranging, demand or acceptance of a bribe is prohibited.

A supplier must not:

- give, offer or promise a financial or other advantage to a public official knowing or intending that it will cause the public official to use his influence or position either to assist the company to obtain or retain business or a business advantage, or to direct business to another person or entity; or
- give, offer or promise any financial or other advantage to any private party in order to induce or reward a breach of trust, impartiality or good faith; or
- request, receive or accept any financial or other advantage for your own or another person's benefit if it leads to a breach of trust, good faith or impartiality.

Facilitation payments¹ are prohibited.

The payment of protection money is prohibited.

Gifts, hospitality and expenses must be modest, proportionate and not influence business decisions.

Examples of gifts, entertainment and hospitality that are prohibited include:

- Any gift or entertainment that would be illegal.
- Any gift of cash or cash equivalent (such as gift certificates, loans, stock, stock options).
- Any gift or entertainment that is a 'quid pro quo' (offered for something in return).
- Any entertainment that is indecent, sexually oriented, does not comply with UPM's values and commitment to respect human dignity or that otherwise might adversely affect UPM's reputation.

Travel and accommodation expenses must be substantiated, reasonable and work-related.

2 CONFLICTS OF INTEREST

UPM's suppliers must avoid any activity which leads to a conflict of interest.

3 ACCURATE BOOKS & RECORDS

UPM's suppliers are required to make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflect any transactions involving expenditures on behalf of the company.

Misleading or false entries that conceal the source or nature of expenditures or receipts are prohibited.

4 MONEY LAUNDERING

UPM's suppliers are prohibited from having any dealings with, or participating in any transactions involving, the financial proceeds of crime.

¹ Facilitation payments are small payments made to officials to obtain routine services (e.g. customs processing or a speedier decision on a permit or license).