Code of Conduct for Executives and Employees

Japan Pulp & Paper Group Code of Conduct for Executives and Employees

This Code of Conduct for Executives and Employees (the “code”) sets out the values and behaviors that should be shared by executives and employees of the Japan Paper & Pulp Group (the “group”) in performing their day-to-day work, in order for the group to implement its Sustainability Policy in line with the group’s Charter of Corporate Behavior. We are responsible for complying with this code, and will ensure that all the executives and employees know, thoroughly understand, and put this code into practice in the course of their respective duties.

1. Contributing to Society through Business Activities

(1) By implementing change, challenge, and creativity, we will provide useful products and services to society, and contribute to sustainable economic growth and solutions to the issues confronting society.

(2) In carrying out our business activities, we will give due consideration to a balance between the economy, society, and the environment.

2. Absolute Compliance with Laws and Regulations

(1) With an awareness of ourselves as members of the international community, we will have a correct understanding of the various laws, regulations, and social norms of countries and regions, and will conform with these in all our activities.

(2) We will comply with the tax codes and relevant laws and regulations in the countries and regions where we do business, and will declare income and pay taxes appropriately.

(3) We will at all times ensure that our business activities comply with laws and regulations. If we become aware of any actual or potential infringement of any laws or regulations, we will make a report immediately to a supervisor, the compliance department, or the whistle-blowing contact desk.

3. Promoting Environmental Protection

(1) We will adhere to applicable environmental protection laws and regulations in the countries and regions where we do business.

(2) In addition to working on activities that contribute to biological diversity and protecting the natural environment, we will undertake measures for the protection and efficient use of forest resources.

(3) We will make efforts to lower the environmental impact of our business activities, through such measures as the reduction of greenhouse gas emissions, waste reduction and appropriate disposal, and the promotion of recycling.

(4) We will use energy, water, and other resources efficiently, and reduce our consumption.

(5) We will promote the development, manufacture, and sale of environmentally friendly products, services, and systems. In our own procurement activities, we will select and purchase recycled materials and other environmentally friendly products.

(6) We will work to prevent environmental pollution by using environmental management systems to establish and regularly review environmental targets, and make ongoing improvements to our status.

(7) We will proactively disclose environmental information relating to our business activities and information on our environmental measures.

4. Respect for Human Rights

(1) We will act in accordance with international norms on human rights, will respect human rights in all situations in our business activities, and will not discriminate against any individual on grounds of ethnicity, religion, faith, gender, sexual orientation or gender identity, nationality, age, place of origin, educational background, physical or mental disabilities, or any other reason.

(2) We will not engage in any form of harassment that might harm the dignity of an individual based on gender, authority, or position. We will also strive to build a workplace that does not tolerate any harassment.

(3) We will not engage in any slander or libel against another person.

(4) We will not tolerate or have any involvement in child labor or forced labor. We will require the same commitment from all our business partners.

(5) We will exercise full care to ensure that human rights violations do not arise in connection with our business activities, and that we do not aid or abet human rights violations by others.

(6) We respect employees' freedom of association, right to join or not to join a union, and right of collective bargaining.

5. Free, Fair, and Transparent Business Practices

(1) We will comply with all anti-competitive laws and regulations including anti-monopoly laws in the countries and regions where we do business. In addition to taking proactive measures against infringements, we will establish internal control systems to detect and correct promptly any infringement that may occur.

(2) We will maintain transparency at all times with regard to public and government officials and will not be involved in any conduct that might raise a suspicion of bribery, payoffs, or granting of favors in exchange for any unfair business advantage.

(3) We will deal with all business partners fairly and equally, and will not give or receive gifts, entertainment, or other economic benefits that go beyond the scope of normal social courtesies.

(4) We will not have any involvement in fraudulent business transactions or money laundering.

(5) We will appropriately manage undisclosed material information that comes to our knowledge through our business activities. We will not buy or sell shares or other securities based on any material information not in the public domain (insider trading).

(6) We will ensure appropriate protection and management of intellectual property and respect the rights of third parties, and will not infringe on such rights.

(7) We will not assume directorship of another company or organization without the approval of the company to which we are assigned, or engage in any business activities that may compete with the group.

(8) We will not engage in any conduct that conflicts or may conflict with the interests of the group.

(9) We will not engage in any political activities in the workplace without the approval of the company to which we are assigned. We will not use any company name of the group or any job title held at the group in any political activities in which we engage in a personal capacity.

6. Provide a Safe and Healthy Working Environment

(1) We are committed to providing a healthy, safe and comfortable working environment where all employees can work together with peace of mind.

(2) We will make ongoing efforts to maintain and improve our physical and mental health, and will be mindful of the health of our supervisors, subordinates, and colleagues.

(3) We will respect individuality and diversity so that everyone can make the most of their abilities. We will work to improve awareness in the workplace so that employees who are providing childcare or nursing care or living with an illness can also continue to fully exercise their abilities.

(4) We will work to achieve work-life balance by reviewing working practices, while seeking to improve productivity.

(5) We will abide by collective agreements and other labor-management decisions and arrangements and work to maintain good labor-management relations.

7. Thoroughgoing Risk Management

(1) We will establish an across-the-board risk management system to prepare for risks including terrorism, cyber-attacks, natural disasters, and outbreaks of infectious disease.

(2) In the event of a disaster or an accident, we will respond in a swift and appropriate manner, always putting the safety of people first.

(3) We will not have any relationship with antisocial forces or criminal organizations that threaten the order and safety of society, and we will never respond to unreasonable demands.

8. Establishing Trust with Business Partners

(1) We will work to provide a stable supply of safe, dependable, and environmentally friendly products and services.

(2) We will proactively disclose information to allow our business partners to make a rational choice of products and services. We will not make any inappropriate presentation or advertising that is factually incorrect, misleading, or might be regarded as discriminatory.

(3) We will strictly protect and manage all confidential information, personal data, and other important information that comes to our knowledge through our business activities. We will not use information for any purpose other than originally intended—both during and after our employment with the group.

(4) As well as working to provide products and services that meet the needs of business partners, we will work to improve customer satisfaction by responding sincerely to feedback from business partners and ensuring that this feedback is reflected in improvements and development of products and services.

(5) We will work to foresee possible risks that might arise in the course of our business and reduce risks and minimize losses.

9. Fair Disclosure and Dialogue with Stakeholders

(1) We will take every opportunity to listen sincerely to the opinions of stakeholders to understand their expectations and requests to the group, including negative opinions, and will work to ensure that these are reflected in our corporate activities.

(2) We will disclose various information relating to our corporate activities to stakeholders in a timely, appropriate, and equitable manner.

(3) We will fulfill our accountability to stakeholders chiefly by taking such measures as accurate information-gathering and record-keeping, and appropriate accounting and reporting.

(4) Should facts emerge that are detrimental to the group, we will never conceal such information, and will make prompt and appropriate disclosures to stakeholders.

10. Harmony with Society and the Community

(1) We will respect, and act in consideration of, the cultures, religions, and customs of the countries and regions in which we do business.

(2) We will contribute to the cultural, economic, and social development of the countries and regions in which we do business.

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