

Corporate Policy

Mitsubishi HiTec Paper Europe GmbH

February 1, 2019

1. General principles

The purpose of our corporate activities is the development and production of coated speciality papers for various areas of application and printing technologies. The quality of our products is based on many years of know-how and state-of-the art coating technology. Consequent market orientation enables us to tailor our products to the requirements of our customers in an optimal way.

A safe working environment, the commitment to quality and product safety, conservation, the constant improvement of energy efficiency as well as a continuous, demand-orientated development of human resources are the most important principles of our corporate philosophy and behaviour. These principles are implemented for the benefit of society and in compliance with national and international legislation and are laid down in our Code of Conduct, Workplace Code of Conduct in the management guidelines and in the compliance guidelines. Compliance management, an internal audit within the scope of the J-Sox regulations, risk management based on ISO 31000, an integrated management system consisting of the certified standards ISO 9001, ISO 14001, ISO 50001 and a hygiene management and product safety concept (INREKA-standard) based on the Good Manufacturing Practice (GMP) are the basis for the compliance and control of our business activities within the framework of existing legislation. These principles are to be safeguarded and continuously improved. The company's management, all its employees as well as other people employed by the company commit themselves to implementing and abiding by these principles. Management regularly reviews the aforementioned corporate principles and updates them as required. We make our corporate principles accessible to all interested parties.

Every employee is entitled to approach their line managers, the safety expert, the integrated management representative or works council with suggestions for possible improvements of these principles or to submit them under the company suggestion scheme.

Every employee as well as all additional people employed by the company are accountable within the areas of responsibility for safety, the optimal quality of work and the protection of the environment in compliance with national and international legislation. Fostering the necessary awareness and the principles governing our behaviour is an on-going managerial task because only motivated and trained employees and the additional external staff work responsibly and with a sense of focus.

We systematically invest in the qualification of our employees in order to maintain and promote their knowledge and awareness of industrial safety, quality issues, corporate environmental protection and hazard prevention. To achieve these goals, training plans and supporting programmes are regularly devised and put into practice in collaboration with the management on the one hand and with technical supervisors and HR management on the other. External staff is carefully instructed and trained. Besides future personnel planning and recruitment and further qualification, an additional long-term orientated personnel development concept includes the implementation of an age-appropriate working environment. An important aspect for maintaining the performance of our employees is the compatibility

of family and work. With different work time models, e.g. trust-based working hours, part-time work as well as sabbaticals, our company contributes to the work-life balance of our employees.

As a responsible company we also stand by our social commitment. Training young people and, in this regard, supporting regional schools, universities, associations, etc. are important to us.

To ensure that the processes and procedures related to industrial safety, to ensuring product quality and conservation are applied, maintained in force and continuously improved, management appoints appropriate representatives to report to it directly on these matters.

2. Corporate Responsibility

As part of responsible corporate management, we stand by our social and community responsibilities. We want our economic efforts to contribute to sustainable economic, environmental and social behaviour. Sustainability applies not only to our own business performance, but also to our interaction with customers, suppliers and business partners for the benefit of society. Our strategic and operating goals, as well as the activities described in the following sections demonstrate our commitment to safety, quality, environment and energy.

The training of young people as well as the support of social institutions is important to us. We support schools, universities and associations as well as charities and cultural events in our region.

The risk management system implemented in both mills helps to identify risks in context of and in relation to internal and external stakeholders in good time, and to monitor and prevent or reduce their effects, which can sometimes lead to opportunities for the company

3. Save working environment

Safety is the highest priority. This is our most important corporate principle. Management provides adequate resources to avert or mitigate the risk of work-related injuries or illnesses. This also applies to the procurement of new machinery, the plant and equipment.

Moreover, the company has developed a Work and Health Management Programme for all people employed comprised of awareness raising, active health support, operational safety, organisational development and operational integration.

Management expects all people employed to be aware of these principles and to take account of and comply with the appropriate regulations in everything they do.

Management further expects all staff involved to assist in making their workplace and that of their colleagues as safe as possible. The same applies in particular to line managers.

4. Commitment to quality

Sustained profits are necessary to safeguard the company and its locations in the long-term. This is critically influenced by our customers' satisfaction with the quality of our current and future products and services. To this end we have introduced a continuous improvement culture (CIC) with the aim of constant optimization of our products and processes while taking into consideration all known risks and potential opportunities.

This goal must be achieved at an economically reasonable cost, based on market-leading, product-specific technologies, in compliance with legal and governmental requirements and environmental aspects.

This requires the efficient planning and use of financial and technical resources, product development and communication processes as well as staff that feels at ease in the workplace and who are qualified and motivated to discharge the tasks assigned to them within their team, independently and with the minimum of mistakes.

A further vital prerequisite is collaboration with suppliers and partners whose products and services demonstrably satisfy our quality requirements on a long-term basis.

To achieve these goals we work in accordance with the following corporate principles, which all management members, all employees as well as external staff are pledged to put into effect:

- > to supply products that comply with the specifications agreed with the customers
- > to offer a product range that meets market requirements
- > to serve and advise our customers attentively and carefully
- > to ensure short delivery times largely orientated towards customer needs
- > to keep a constant eye on products and processes and continuously improve them, having regard to market developments
- > to ensure that process and product developments take account of their efficiency and ensure their environmental sustainability
- > to improve communication, where necessary
- > to employ highly motivated and qualified employees as requirements dictate
- > to work in partnership with our suppliers to achieve the best possible solution both in terms of quality and efficiency
- > to continuously promote the development of new products and to make the most efficient use possible of resources for research and development

- > to continuously review work processes and focus on improving them
- > to see cooperative interaction as part of a corporate culture which sets greater store by a results-oriented approach to work than the importance of position and role
- > to play an active part in the exchange of information within the company

These quality-related guidelines underpin not just how we behave on an everyday basis but also our strategic decisions. To this end we enshrine them in concrete quality objectives.

5. Conservation

In addition to taking responsibility for the staff in terms of industrial safety, health protection and fostering quality consciousness and the product safety that goes with it, conservation and the careful husbandry of all resources is a third important corporate objective.

Conserving our natural environment and resources for today's and future generations is of fundamental significance for our company. We consider environment protection and environment-orientated actions to be essential corporate tasks that are firmly embedded in our management principles.

According to our conception of product responsibility as the responsibility during the entire life cycle from development, manufacture through proper use on the part of the customer to disposal, re-use and recycling, our processes and activities are carried out in such a way so as to avoid making any negative impacts on the environment.

Compliance with the relevant environmental and approvals regulations required by law is of course the prerequisite for everything our company does. This principle also applies to contractors working for us and on our business premises. We ensure compliance with environmental regulations by means of company structures and procedures to protect the environment.

Our actions are based on the following principles, having regard to economic and market specific conditions:

- > We are committed to continuously improving the protection of the environment in our business operations, keeping abreast of environmental and conservation developments in the process, and play an active part in the associated technical debates. We underpin the ensuing improvement process by regularly setting environmental objectives, reviewing them and putting them into practice through environmental programmes.
- > Responsibility for environment protection concerns every single member of our staff. Therefore, according to their tasks all people are regularly informed, trained and committed to observing the guidelines.
- > By using predominantly natural resources, paper manufacturing interacts intimately with the environment. If necessary, we develop solutions to avoid or mitigate adverse effects on the environment and also ensure their implementation.

- > We undertake to make effective use of our raw materials and supplies and the energy we require, wherever possible designing processes to reduce consumption, prioritise the avoidance or reduction in waste and other emissions and comply with the requirement to find substitutes for hazardous substances. This also applies to the introduction or modification of products and product processes.
- > The cellulose we use is from known sources and complies with the demand for sustainable forestry practices – for example, we meet the current FSC® and PEFC standards for controlled sources.

In the event of the uncontrolled release of substances, the processes, procedures and measures we have put in place ensure that the consequential impact on humans, fauna and flora and the environment is minimised to the greatest extent possible. Moreover, when incidents like that occur, we ensure maximum transparency by timely communication with the competent authorities.

We promote and practise an open dialogue with outside bodies such as neighbours, competent authorities and our customers on specific location and production-related environmental issues. We actively involve our contractors in the applicable environmental management regulations.

6. Energy Management

The continuous improvement of energy efficiency assumes particular importance as a vital element in conservation. The manufacturing of our products depends on the use of thermal and electrical energy. The use of compressed air in operations is on a significantly smaller scale.

Reducing the specific energy consumption and specific energy costs per product unit is therefore a desired objective both from an economic and from an environmental and resource conservation perspective. At the same time, reducing greenhouse gas emissions is our contribution to climate protection. Wherever it makes sense to use renewable energies, we give them priority.

Installing and progressively developing a monitoring system for tracking our energy consumption underpins our energy management and is indispensable in deriving and monitoring operational energy targets.

Our compliance with statutory regulations and requirements is a self-evident prerequisite in setting ambitious targets, keeping them under regular review and monitoring their success.

Our energy management is part and parcel of our integrated management system, thereby ensuring that all aspects of the relevant standards are taken into consideration.

We have mandated our behaviour, determined by the aforementioned principles, in our management system documentation. This management system is subject to regular, recurring internal and external audits. We thereby ensure that it is constantly up to date and effective.