# Ahlstrom Modern Slavery Statement 2025

## Purpose and Scope

This statement, made in accordance with the section 54 of the UK Modern Slavery Act 2015, outlines the steps Ahlstrom has taken during the financial year 2025 to prevent modern slavery and human trafficking in its own operations and supply chain.

## Our Commitment to Human Rights

Ahlstrom is committed to respecting human rights across its operations and expects the same standards from its business partners. We recognize that modern slavery and human trafficking are serious global challenges, and we view addressing these risks as a core responsibility of our business.

Ahlstrom does not tolerate child labor, forced labor, modern slavery, or human trafficking in any form. We are committed to supporting the wellbeing, fair treatment, and dignity of all individuals impacted by our activities and value chain.

## Our Business & Supply Chains

Ahlstrom is a global leader in combining fibers into safe and sustainable specialty materials. Through our fiber-based material science expertise, we apply our deep understanding of fibers and their applications to develop innovative solutions for our customers.

In 2025, Ahlstrom reported net sales of approximately EUR 2.9 billion. The company employs around 7,000 people and operates two R&D centers and 36 production sites across 13 countries, including the United Kingdom. Ahlstrom operates through three core divisions: Food & Consumer Packaging, Filtration & Life Sciences, and Protective Materials. In addition, a dedicated Performance Materials Cluster was established on 1 May 2025.

Ahlstrom's supply chain is diverse in terms of size, geographic footprint, and the nature of goods and services supplied. Our fiber suppliers include commodity pulp producers, large manufacturers of synthetic fibers, and smaller-scale farmers supplying niche fibers such as abaca, an annual renewable fiber. We also source materials and services from chemical suppliers and a wide range of indirect suppliers, including providers of equipment, energy, water, and services, operating at both global and local levels. In 2025, 92% of the fiber volumes used in Ahlstrom's specialty materials consisted of wood fibers. Of the remaining volumes, 2% were other renewable fibers and 6% were synthetic fibers.

In the United Kingdom, Ahlstrom's operations comprise two manufacturing sites, as well as sales activities and the procurement of raw materials and services. Net sales from the UK represented approximately 2.4% of total Group net sales in 2025, and UK employees account for approximately 3% of total Group headcount.

Further information about Ahlstrom is available at: https://www.ahlstrom.com.

## Our Policies & Commitments

Ahlstrom has established a set of policies and commitments that underpin its approach to preventing modern slavery and human trafficking in its operations and supply chains.

Code of Conduct: Ahlstrom's way of working is guided by the company's Code of Conduct which sets out the ethical principles that direct how we conduct business. The Code of Conduct establishes clear expectations for integrity and ethical behavior and ensures compliance with applicable national and international laws and regulations. The Chief Legal Officer and General Counsel is accountable for implementing the Code of Conduct. In the event of a breach, appropriate corrective actions are taken. Remediation measures may include policy updates, targeted training, disciplinary actions, or support services for affected individuals.

Social and Human Rights Policy: Through Ahlstrom's Social and Human Rights Policy, we commit to acting in alignment with the UN Guiding Principles on Business and Human Rights (UNGP) and to respecting internationally recognized human rights, as set out in the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The policy outlines Ahlstrom's commitment to respecting human rights and explicitly states that Ahlstrom does not accept or tolerate child labor, forced labor, or human trafficking in any form. The EVP responsible for Sustainability is accountable for implementing this policy.

Supplier Code of Conduct: Ahlstrom's Supplier Code of Conduct defines the minimum requirements that all suppliers are expected to meet, including requirements related to human rights, labor standards, ethics, and compliance with applicable laws. The Supplier Code of Conduct incorporates access to Ahlstrom's SpeakUp channel, providing suppliers with a confidential mechanism to raise concerns and report potential violations of ethical standards, including risks related to modern slavery.

Sustainable Procurement Policy: Ahlstrom's Sustainable Procurement Policy describes the principles that guide our supplier relationships and sets clear, non-negotiable minimum requirements related to legal compliance, human rights, and freedom of association and collective bargaining. The policy also includes requirements to promote sustainable forest management within the supply chain. The EVP responsible for Sustainability is accountable for implementing this policy.

Human Capital Policy: Ahlstrom's Human Capital Policy reflects the company's values and guides how we support our people. We are committed to fairness, respect, and sustainability, creating safe, inclusive, and equitable workplaces where every individual can thrive. We are committed to actively engaging employees through feedback and dialogue and our approach to workforce planning, recruitment, and onboarding promotes fair and inclusive practices aligned with business needs. Wellbeing is prioritized with safe, healthy, and flexible work environments. The Chief People Officer is accountable for implementing the Human Capital policy.

SpeakUp Channel: Ahlstrom maintains a SpeakUp channel that is available to all employees and external stakeholders. The channel provides a confidential way to report suspected misconduct, including potential human rights violations or risks related to forced labor or human trafficking. Ahlstrom also has internal guidelines, which support the use and management of the SpeakUp channel.

UN Global Compact's Ten Principles: Ahlstrom Group has been a signatory to the United Nations Global Compact since 2017. Participation in the UN Global Compact affirms our commitment to its ten principles covering human rights, labor standards, environmental responsibility, and anti-corruption.

These policies may be found at https://www.ahlstrom.com/sustainability/policies/.

## Risk assessment, Due Diligence and Preventative Measures

### Human Rights Due Diligence

Ahlstrom's approach to preventing modern slavery and human trafficking is based on ongoing human rights due diligence, in line with the UN Guiding Principles on Business and Human Rights. Our due diligence process is designed to identify, assess, prevent, mitigate, and address risks of adverse human rights impacts across our own operations and supply chain.

Key elements of this due diligence approach include risk identification and assessment, supplier onboarding and qualification requirements, certification and monitoring systems, supplier engagement and corrective action processes, employee training, and accessible grievance mechanisms. These activities are integrated into Ahlstrom's procurement processes.

## Risk Identification and Assessment

Ahlstrom recognizes that the risk of modern slavery and human trafficking may exist across its entire value chain, including within its own operations. However, the highest risks have been identified in certain areas of the supply chain, particularly within specific supplier categories and geographies. The most significant risks are associated with early stages of the supply chain, where subcontracting structures may be complex, work may involve manual labor, and migrant workers may be employed. Within Ahlstrom's supply chain, this primarily relates to forestry operations and plantation work.

In 2025, Ahlstrom conducted a human rights impact assessment covering its supply chain and own operations, with a focus on risks to people and communities. This assessment enabled the company to identify its key human rights risks, with further prioritization of salient impacts planned to inform ongoing due diligence and mitigation measures. In 2026, Ahlstrom will continue to develop its approach by expanding the scope of the assessment to cover its full value chain. In addition, Ahlstrom has been accepted into the UN Global Compact Finland Business and Human Rights Accelerator program. Participation in this program will further strengthen Ahlstrom's human rights impact assessment capabilities and support the development and implementation of its human rights due diligence processes.

## Prevention and Mitigation Measures in the Supply Chain

Ahlstrom's Procurement function leads the efforts to ensure that suppliers understand and adhere to the expectations set out in the Supplier Code of Conduct. The Supplier Code of Conduct establishes clear, non-negotiable minimum requirements related to compliance, human rights, and the prevention of child labor and forced labor, among other topics. All new suppliers are required to sign the Supplier Code of Conduct or be considered as compliant. In addition, existing key suppliers are prompted to sign the Supplier Code of Conduct. By the end of 2025, 76% of suppliers with annual spend exceeding EUR 1 million had signed the Supplier Code of Conduct.

In 2025, Ahlstrom piloted the inclusion of environmental, social, and governance (ESG) criteria in requests for quotation (RfQs), and these criteria are now a requirement for all RfQs. Supplier selection criteria include, for example, external sustainability assessments such as EcoVadis and CDP, as well as supplier's approach to Free, Prior and Informed Consent (FPIC), where applicable. Critical subcontractors must be compliant with ISO 45001.

Pulp is Ahlstrom's largest individual procurement category. All purchased pulp is either certified or minimum controlled source under a certified chain of custody. Ahlstrom monitors wood originating from forests used in pulp and paper production through its Due Diligence System (DDS) for Wood Legality, which is implemented across its global operations. The DDS is designed to prevent controversial practices related to environmental, ethical, and social impacts in forest-related industries and supports verification that wood and wood-based materials originate from FSC®, PEFC, or SFI® certified sources, or minimum controlled source through certified chains of custody, including the controlled use of FSC-certified materials throughout the value chain.

Ahlstrom operates a supplier ESG engagement program through which it collaborates with suppliers via a dedicated platform, EcoVadis. This program enables Ahlstrom to monitor and assess suppliers' ESG performance, including human rights practices affecting their workforce and supply chain workers, and to support the reduction of suppliers' $CO_2$ emissions. In 2025, suppliers representing 48% of Ahlstrom's total spend participated in the program.

In the end of 2025, Ahlstrom increased its focus on human rights within this program. As part of this effort, Ahlstrom requested corrective actions from suppliers that lacked adequate policies or measures to prevent child labor and forced labor, or where no social audits had been conducted. Engagement with suppliers is ongoing and progress is continuously monitored. In addition, Ahlstrom has strengthened supplier engagement to address forced labor risks beyond

forest certification schemes in the Nordic countries. This includes working with suppliers to ensure that robust due diligence and monitoring processes are in place, particularly where forestry work is subcontracted. This engagement will continue throughout 2026.

### Prevention and Mitigation Measures in Own Operations

Ahlstrom acknowledges that risks related to modern slavery may also exist within its own operations, particularly where subcontracted labor is used. To mitigate these risks, Ahlstrom has implemented multiple measures. Twenty-four of Ahlstrom's production sites are certified under forest certification schemes, with audits covering requirements related to core labor rights. In addition, forced labor criteria have been integrated into the qualification and evaluation processes for critical suppliers at all sites. Ahlstrom's health and safety management system covers the entire workforce, temporary workers, contractors, and visitors, empowering everyone to take ownership of their safety and the safety of others. 31 out of 36 production sites have certified ISO45001 Occupational Health and Safety Management Systems.

To ensure that employees are aware of and understand Ahlstrom's Code of Conduct, a mandatory e-learning training program has been in place since 2018. All employees are required to complete the training biennially, and it forms part of the onboarding program for new hires.

### Monitoring, Reporting and Effectiveness

Ahlstrom recognizes that addressing modern slavery risks requires continuous monitoring and evaluation, including periodic review of its due diligence processes to assess effectiveness. One method of monitoring is the review of reports received through the company's grievance mechanisms. Possible violations of the Code of Conduct, company policies or applicable laws and regulations should be reported to line manager, the People & Culture or Compliance functions, or anonymously through the SpeakUp channel, available by phone or web. The SpeakUp channel is accessible to both internal and external stakeholders in multiple languages and reports can be made without fear of retaliation.

To assess the effectiveness of our actions, Ahlstrom monitors a range of qualitative and quantitative indicators, including the proportion of high-spend suppliers committed to our Supplier Code of Conduct, supplier participation in ESG engagement programs, findings from certifications and audits, sustainability assessment outcomes, and issues raised through grievance mechanisms. By the end of 2025, Ahlstrom had not identified any severe human rights incidents within its operations or supply chain.

Ahlstrom's sustainability management practices are assessed annually by EcoVadis. In 2025, Ahlstrom received a Platinum rating, placing the company in the top 1% of companies assessed over the past 12 years. The EcoVadis assessment includes evaluation of policies and actions related to respecting human rights in both the supply chain and own operations.

The prevention of modern slavery is an ongoing effort, and Ahlstrom will continue to develop and strengthen its human rights due diligence to address evolving risks and to protect people across its operations and value chain.

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This statement constitutes the Modern Slavery Act Transparency Statement for the Ahlstrom Group for the financial year 2025. It has been approved by the Board of Directors on September 30, 2026.



Helen Mets
President & CEO