

Public Affairs Guideline

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Purpose of public affairs at Ahlstrom

Ahlstrom is a global leader in fiber-based materials, supplying innovative and sustainable solutions to its customers. Our purpose is to Purify and Protect, with Every Fiber, for a Sustainable World.

Our strategy, purpose and values form the guiding principles for how we act and behave. They are the compass for our day-to-day actions and key to the successful delivery of our vision and strategic ambition.

Public Affairs refer to Ahlstrom's official contacts with authorities and other governmental organisations. EVP Pricing, Procurement & Sustainability has overall responsibility of the Group wide public affairs agenda and VP Sustainability and Public Affairs is responsible for the implementation across the organisation. Respective business unit/plant manager deals with local matters in alignment with group public affairs agenda.

The purpose of public affairs is to further our ambition to support the transition to a circular economy and operate as resource efficiently as possible with continuous improvement as guiding principle.

The purpose of this public affairs guideline is to provide employees with guidance how to comply with our Code of Conduct in public affairs & external events engagements and shall be followed by all employees.

This public affairs guideline applies to Ahlstrom Oyj and its business units and subsidiaries. Actions taken pursuant to this policy will be performed by employees of Ahlstrom Oyj.

Key Advocacy Areas

Our policy priorities are to

- Support value chain system solutions for improving the sustainability of fiber-based products and materials
- Support development towards a more circular society
- Promote transparency and scientific and evidence-based decision making

All engagement activities shall be conducted in line with the goals of the Paris climate agreement and our climate action commitment according to the Science Based Targets initiative.

Trade Associations

3.1 Role of trade associations

Trade associations can play an important role in business and further develop the industry together with other stakeholders. Activities within trade associations can serve a useful function and supports our commitment to stakeholder engagement and capacity building on environmental issues. Activities and participation in trade associations should be carefully considered and examined, especially from the aspect of managing competition law risks.

3.2 Process for joining a trade association

Approval from 1. BU Head, 2. Division Head, and 3. VP Sustainability & Public Affairs is required in cases when Ahlstrom wishes to join a trade association.



The membership will be recorded by the company representative(s) in the association membership list managed by Ethics & Compliance.

All trade associations must have guidelines for compliance with competition rules.

Our participation in trade associations is reviewed annually by the Legal function to ensure that our participation generates value, supports our sustainability goals and strategy of Ahlstrom.

3.3 Best practices during trade association interactions

Any external communication shall be conducted in line with Ahlstrom Oyj Communication Policy. We comply with applicable local, national and international laws and regulations wherever we do business.

When attending meetings ensure that:

- There is an agenda available ahead of the meeting
- The agenda should be followed during meetings
- The trade association's guidelines for compliance with competition rules should always be covered before the meeting commences and be recorded in the meeting minutes
- Minutes should be available from each meeting, including a list of attendees
- Any material distributed during the meeting should be prepared by the trade association in advance to ensure compliance

3.4 Information exchange

We exchange information relating only to topics that do not involve communicating sensitive information or competitively sensitive information and will not solicit any such exchange from other parties.

In the event of any sensitive or competitive information being disclosed unsolicited during an exchange and in violation of the trade association's guideline for compliance, immediately object and clearly explain that such conduct is against our code of conduct. Immediately after end the exchange and contact the VP of Sustainability & Public Affairs and Legal.

Internal and external stakeholders also have the possibility to anonymously report grievances through our SpeakUp whistleblowing channel.

3.5 Funding decisions

Should we wish to contribute funding to a trade association in addition to standard membership fees, we will voluntarily disclose this information on our company website.

To determine whether to contribute with additional funding or not, the proposal should be brought by the employee trade association representative(s) for approval from 1. (a) BU Head or (b) Division Head, and 2. VP Sustainability & Public Affairs. This will be decided on a case-by-case basis and only proceed if it aligns with the guidance in the Public Affairs policy and Code of Conduct. We are committed to not funding climate-denial or lobbying against climate regulations.

Lobbying

If we have direct engagement with governments and/or their representatives to share our information and perspective on public policy, we will follow all regional and national laws as applicable. Lobbying is done in a transparent and factual manner. Within the European Union lobbying is conducted by individuals formally registered in the EU transparency register.

Any direct engagement will be decided on a case-by-case basis according to the need. The decision to lobby needs to be approved by the EVP Pricing, Procurement & Sustainability. The



person representing Ahlstrom should consult with their line manager and VP Sustainability and Public Affairs to determine that the matter is relevant prior to any direct engagement. If necessary, extended discussions to determine each case should be held with the VP Corporate Communications and other company representatives involved in lobbying activities.

Governance

Sustainability is a key element of our governance with the Board of Directors and CEO carrying the ultimate responsibility for the implementation of the sustainability strategy. Sustainability & Public Affairs is an independent function to oversee the implementation of the sustainability strategy. As part of our internal governance process, we have delivered company-wide training on climate change to all employees. We have internal public affair calls every quarter offering everyone representing the company in trade associations the possibility to get the latest update and align on public affair activities.

We comply with all applicable legal and regulatory obligations in the countries where we operate. The Public Affairs Policy is a business strategic document that is approved by the Executive Management Team of Ahlstrom.

Responsibility of the Group public affairs is with the Executive Vice President, Pricing, Procurement and Sustainability, with direct reporting line to Group President and CEO. Group Executive Management Team collectively approves the public affairs focus areas and targets. The Board of Directors regularly oversees the public affairs work carried out in Ahlstrom.

This Guideline is subject to annual review.