

Group Communication, Branding and Information Policy

1. Introduction and Purpose

Billerud's purpose is: We make high performance packaging materials for a low carbon society. The company is positioned as a leader in high performance and sustainable materials made from fresh fiber in the global paper and packaging materials industry, with a presence and operations around the world.

Communication is a strategically important aspect of Billerud's business activities and development. Communication with Billerud's stakeholders is essential in maintaining and reinforcing goodwill, while leaving room for commercial maneuverability. Communication shall be adapted to the target group, while adhering to our brand platform, building long-term credibility, and being clear, accurate, and consistent.

Billerud shall use and protect its data and information resources in a manner that optimally promotes and protects the company brand, as well as the interests of the company and its stakeholders.

The purpose of Billerud's Communication, Branding, and Information Policy is to set rules on how Communication, Branding, and Information-related activities should be handled to ensure that Billerud meets its objectives while also complying with rules and regulations. This Policy is supplemented by underlying directives that set out more detailed rules concerning Communication, Branding, and Information.

2. Scope and Applicability

This Group Policy (the "Policy") applies to Billerud AB and its controlled subsidiaries ("Billerud" or "the Group") and covers Billerud's business activities and operations globally. The Policy applies to everyone who works for or on behalf of Billerud, including board members, employees, interns, and contractors ("Representatives").

The Policy owner is responsible for communicating and implementing this Policy. However, all Billerud Representatives are individually responsible for reading, understanding, and following this Policy.

3. Communication

3.1 Prioritized target groups

A process shall be in place to identify Billerud's prioritized target groups for communication with the aim of creating the maximum possible value in terms of the Group's development and business. These target groups shall be selected based on long-term development, as well as the more immediate interests of the organization, the brand, and the business.



3.2 External communication (via mass media)

Relationships built on trust between the earned media and the Group's representatives are important with respect to profiling Billerud. Only designated spokespeople may express views on behalf of the Group in media. Spokespeople are appointed by Global Communications on behalf of the CEO.

3.3 Internal communication

Internal communication shall have high priority and be up-to-date, relevant, and comprehensible, while meeting material requirements/expectations from all employee categories. Information that promotes the health and safety of our employees and partners shall be given particularly high priority. All employees shall be familiar with Billerud's purpose, Code of Conduct, core values, goals, strategy, and offering to the market, as well as with how their own efforts contribute to the whole. Communication shall be viewed as an issue of strategic management and shall be an integrated component in every manager's leadership responsibility.

3.4 Market communication

Communication with our customers and potential customers on current and new markets shall essentially be based on and comply with the Group's brand guidelines and brand narrative. At the same time, it shall be relevant and effective in achieving the business aims it is intended to support.

3.5 Digital communication and social media

Communication via Billerud's own external digital channels (including social media) shall present a consistent and transparent picture of the Group and its brand, as well as of its offering to the market. Billerud shall use social media as a natural communication channel, for example in the Group's dialogue with stakeholders. Only designated spokespeople may express views on behalf of the Group in external digital channels (including social media).

3.6 Investor Relations

Billerud's shares are publicly listed on Nasdaq Stockholm. The Group is required to comply with applicable rules regarding disclosure of insider information (including the Market Abuse Regulation and Nasdaq Stockholm's Rulebook for Issuers). The main rule is that insider information shall be disclosed as soon as possible. In certain situations, disclosure may be delayed if certain conditions are met. The information disclosed shall be clear, accurate, and relevant and shall enable as accurate a valuation of the share as possible. Billerud shall have processes in place that ensure orderly and proper assessment and handling of insider information in compliance with applicable rules.

3.7 Crisis communication

All crisis communication shall be accurate and objective, while caring for any individuals who may be directly or indirectly affected.

3.8 Public Affairs

The regulations governing Billerud's activities are constantly changing. Good relationships with decision-makers are important. The work of Public Affairs shall be transparent, professional, proactive, ethically conducted, and solution-oriented, while informing about our industry and our specific challenges.



4. Branding

Billerud, as a single cohesive brand, shall be used as the main brand, both internally and externally, for all corporate and market communication. All parts of the organization shall operate from the same strategic brand and share the same core assets, such as visual identity and strategic messaging. The Billerud brand identity shall reflect what we stand for as a company and organization: the ambition, personality and promise to our customers and other stakeholders. Therefore our actions, language, and appearance shall always be communicated based on the brand platform. Sustainability shall always be at the heart of our brand.

5. Information

5.1. Information management

Billerud recognizes the potential, business, and personal value embedded in information, as well as the need for effective information security and data privacy, including in relation to data processed in our IT systems and services. Billerud shall intentionally manage its information assets to leverage and protect its value. Planning and execution of business activities shall always consider aspects that ensure confidentiality, while maintaining the integrity, accessibility, and quality of the information and information systems. Information design shall always be incorporated into the design of processes and solutions to ensure that the value of information can be effectively leveraged and protected.

5.2. Information value creation

The data collected shall be transformed into understandable information, which in turn builds knowledge and generates value. Information is a component of, and adds to, product and brand recognition; customers and partners appreciate this value, which must be preserved. Effective information management facilitates operational efficiency, supports sustainability, and accelerates innovation.

5.3. Information risk management

Working methods shall be transparent to ensure that stakeholder expectations are realized with respect to data privacy. All undertakings within the field of data protection shall duly consider the state of the art and costs of implementation, as well as the nature, scope, context, and purposes of processing, along with the varying likelihood and severity of risk to the rights and freedom of natural persons, the value of the data, and other internal and external demands.

5.4. Information security and data privacy

Billerud's stakeholders shall be ensured that confidence and trust in our processing of their data and information is maintained. Safeguarding the value of our brand must be an integral part of our information security at all times. Stakeholders' data and information shall be handled in accordance with recognized and documented information security and privacy standards, the General Data Protection Regulation (GDPR), or other applicable data privacy legislation. The information security and privacy standard that is used as guidance is ISO/IEC 27001.



6. Accountability, monitoring, and compliance

This Policy has been approved by the Board of Directors of Billerud. The Policy owner EVP Human Resources and Communications is responsible for implementing this Policy, including by:

- (i) developing more detailed rules (Directives) for the subject matter, consistent with the purpose and intent of this Policy,
- (ii) ensuring that the Policy and underlying Directives are communicated and known to Representatives,
- (iii) monitoring and following up compliance with the Policy and underlying Directives; and
- (iv) taking other actions, including corrective and reporting measures necessary to achieve the purpose and intent of this Policy.

Billerud's Representatives are expected to report violations (including suspected violations) of this Group Policy to their immediate supervisor or to the Policy owner. Anonymous reporting of wrongdoings can be made through Billerud's whistleblowing system (Speak-Up Line). Questions or feedback about this Policy can be directed to the Policy owner.

