

## **Policy Summary**

Schweitzer-Mauduit International SARL and its subsidiaries (“SWM”) are committed to respecting the fundamental human rights of every individual involved in their day-to-day activities. This policy sets out clearly the human rights principles that SWM upholds across all levels of its organization.

## **Applicability**

This policy applies to all SWM employees, as well as the suppliers and distributors of its products. SWM is committed to working with and ensuring its suppliers and distributors uphold the principles set forth in this Policy and to adopt similar policies within their own businesses.

SWM recognizes that business activities with an adverse impact on human rights can, in some cases, entail civil and criminal liability for the people responsible for the business’ activities.

## **Policy Specifics**

### **Governing Principles**

SWM believes in the inalienable rights of all individuals, in the equal rights of men and women, and that human rights, including economic, social and cultural rights, should be protected and respected regardless of race, color, ethnicity, national origin, sex, sexual orientation, gender identity, religion, age, disability, political affiliation or other status protected by applicable law.

Our steadfast commitment to human rights is reflected in our values and in our Code of Conduct. We are clear in our expectations for diversity and inclusion, worker compensation, health and safety, anti-harassment and more. We support the principles and protection of human rights outlined in the United Nations’ Universal Declaration on Human Rights, where human rights range from the most fundamental – the right to life – to those that make life worth living, such as the rights to food, education, work, health, and the various freedoms protected by international law.

This Policy incorporates those principles, as well as those set forth in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the United Nations Global Compact, and the United Nations Sustainable Development Goals. This human rights policy equally commits SWM to the United Nations’ Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the European Union’s Charter of Fundamental Human Rights, and the European Convention on Human Rights.

In some countries where we operate, social issues are part of a broader context, and our manufacturing sites and offices are actively involved in their local communities through charitable giving, volunteering, and environmental stewardship. We believe that SWM can thrive and grow in societies and operations where human rights are protected and respected and we are committed to doing our part to support these rights.

## **SWM's Commitment**

We affirm that we:

- Respect and comply with all applicable labor and employment laws and rules.
- Pay employees competitive wages within the market.
- Fulfill collective bargaining agreements where our workers are members of a union and respect our employees' right to Freedom of Association and right to join trade unions.
- Support equal pay in the workplace and the supply chain, and all employment decisions are based on merit, experience, and workplace aptitude.
- Believe that employees are our greatest asset and working safely is always our number one priority.
- Provide a safe and healthy work environment where risks are identified and addressed.
- Provide a work environment where employees can confidentially raise concerns and we do not tolerate any form of harassment or intimidation or any actions that create a hostile work environment.
- Respect employees' right to leisure time and commit to enforcing reasonable working hours.
- Accomplish more when we include people with diverse backgrounds, talents and ideas working in an environment where everyone can contribute and fully utilize their talents.
- Believe diversity and equality add to the richness of our company culture and increase our creativity, enabling us to generate additional value for our customers and shareholders.
- Create and nurture a culture where employees have a sense of belonging and are comfortable voicing their opinions and asking questions.
- Support inclusive and equitable quality education and promote learning opportunities for the personal and professional development of our employees.
- Support social justice and equal treatment under the law and prohibit discrimination in the workplace and the supply chain.
- Prohibit the use of child labor, slavery, forced or compulsory labor and human trafficking and exploitation. We prohibit the hiring of individuals under 18 years of age for positions in which hazardous work conditions exist. We expect all business partners to comply with all applicable legislation and labor laws.
- Prohibit in absolute the use of torture.
- Believe in equality before the law and in everyone's right to a fair trial.
- Respect and believe in the right to own property.

- Expect our suppliers and business partners to operate consistently with the principles and adhere to our Supplier Code of Conduct.
- Believe access to safe drinking water is a fundamental human right. We understand that equitable access to safe drinking water is necessary for human dignity as well as a robust and functioning society.

## **Looking to the Future**

SWM follows attentively developments in human rights law and acknowledges the possible requirement for compliance with future legislation on this matter, namely the European Union's proposed Corporate Sustainability Due Diligence Directive and Regulation concerning the prohibition of forced labor. SWM acknowledges that it is likely to be subject to due diligence obligations on its supply chains to ensure compliance with human rights laws and as such commits to putting such compliant procedures in place as and when legal requirements come into force.

## **Questions**

If you have any questions about applying this Policy, or if you are concerned about behavior that may be in conflict with this Policy, you have several options:

- Talk to your manager. Be as specific and detailed as possible so he or she understands the situation and your concerns;
- Contact your manager's manager or another member of management;
- Contact Human Resources;
- Contact a member of the Legal Department; or
- Contact the SWM Hotline, which offers an option to report your concerns anonymously. The numbers and web address are posted at your site.

SWM does not tolerate retaliation of any kind for concerns raised in good faith.

## **Process for Exceptions**

SWM expects no exceptions will be needed to this Policy.

## **Corrective Actions for Non-Compliance**

Failure to comply with this Policy may include corrective action and enforcement subject to local legal requirements.

SWM's intent is to comply with all controlling national, federal, state, and local laws, rules, regulations, and ordinances. If any portion of this Policy conflicts with any such law, the controlling law applies. SWM may modify, revise, amend, or delete its policies and procedures in whole or in part, with or without notice, as it deems necessary or appropriate

and/or to comply with changes in the law. This Policy is not intended, nor should it be construed, as a guarantee or promise of employment for any specific length of time, or to create a contract of employment or other contractual rights.

**Effective Date: 1<sup>st</sup> April, 2024**

**Policy Owner: Legal**

The Audit Committee of the SWM Board of Directors provides oversight of this Policy as well as any identified non-compliance and related remedies.

*This Policy replaces and supersedes any prior policies or practices, including similar existing legacy or local policies and practices.*