

GUIDELINE

FOR MAKING SUSTAINABILITY CLAIMS AT UPM

This Guideline is approved by the Stakeholder Relations Management team of UPM-Kymmene Corporation on 11.12.2023 and it is publicly available at [upm.com](https://www.upm.com).

More detailed practical instructions, terminology glossary and e-learning package have been developed for internal and specified external use to enable a clear and robust process and instructions for making sustainability claims at UPM.



*"Sustainability claims reflect our values and expertise, add to our brand value, and most of all, drive our purpose of **creating a future beyond fossils.**"*

To succeed in promoting our purpose, all our sustainability related communications and marketing must be credible, accurate, evidence-based, and compliant with local and international laws, regulations and principles."

PURPOSE AND DEFINITION

The purpose of this Guideline is to promote the appropriate use of sustainability claims and to ensure that certain common laws, regulations, and principles are followed at UPM.

We expect that every sustainability claim we make is accurate, verified and presented in a clear and specific manner.

The claim is to be relevant and not hide important information, and comparisons made are to be fair and meaningful.

Specific care is to be taken when communicating about carbon neutrality and offsetting.

A sustainability claim is voluntary and made by a company or an organisation about the specific sustainability-related 'credentials' of a process, product, service, company, or organisation.

Such claims may take place in the form of information on labels, through a brand name, within a company's name, or in marketing and communications and can be written or oral. A sustainability claim can be made publicly or semi-privately.

Due to different country and region-specific requirements, each business needs to familiarise itself with legal frameworks to ensure their sustainability claims are compliant.

SCOPE

This Guideline sets the baseline for claims regarding

- environmental performance (including pollution, carbon, waste, biodiversity, and forests)
- social performance (including human rights, living wages and equality)
- governance (including good corporate citizenship, corruption-free practices, and being a significant taxpayer)

The claims need to apply across the whole product or service 'life cycle' – from R&D, sourcing, product development and product design, to other critical elements such as labelling, marketing, value proposition, and communications.

All sustainability claims are to be compliant with the new regulation and directives under the European Green Deal, including:

- Empowering Consumers for the Green Transition Directive
- Ecodesign for Sustainable Products Regulation
- Green Claims Directive





All sustainability claims need fulfil the following criteria:

1. Claims must be accurate and verified.
2. Claims must be presented in a clear and specific manner.
3. Claims must be relevant and not hide important information.
4. Comparisons in claims must be fair and meaningful.
5. Specific care must be taken when communicating about carbon neutrality and offsetting.

1

CREATE

2

**GET
FEEDBACK/
APPROVAL**

3

FINALISE

4

UPDATE

- Have all possible sustainability aspects been considered?
- Have all relevant life cycle phases been considered?
- Is accurate and verified data available?
- Is the claim aligned with the sustainability claims criteria and made in accordance with the UPM's Sustainability Claims Instructions?
- Is the claim consulted with relevant sustainability experts?
- Has feedback been received from all relevant parties?
- Is the claim reviewed and approved by a body or person with needed authorisation?
- Is the storyline clear and credible?
- Is there any new/revised legislation that need to be aligned in the claim?
- Are there changes in data, information or processes that might impact the validity of the claim?
- Are the required updates validated with relevant experts?
- Are needed verifications in place?

THIS GUIDELINE IS AVAILABLE AT UPM.COM AND SUPPORTED BY:

- internal practical instructions giving more detailed guidance on how to make the claims and how to learn from concrete examples of successful and misleading claims.
- internal UPM Sustainability Glossary including key sustainability related terminology to support the use of this Guideline and related practical instructions.
- e-Learning package for relevant internal and external stakeholders.





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