

Anti-Bribery and Corruption Policy

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1. Purpose

The purpose of this Anti-Bribery and Corruption Policy (the “Policy”) is to lay down the rules to be applied at Essity in order to prevent corruption in all activities under Essity’s control.

2. Scope

Essity requires that all employees and companies within the Essity Group act in compliance with this Policy.

Violations of this Policy will always be taken seriously and may lead to disciplinary action; in case of serious breaches up to and including termination of employment.

If in doubt about the applicability of the Policy or in case of conflict with local law advice may be obtained from local HR responsible or Essity Legal.

3. Description

3.1. Principles

Essity believes that sustainable success in business is only possible where there is free and fair competition. Based on

these fundamental principles and our legal obligations, Essity does not tolerate any form of corruption or bribery and the overall objective is to prevent any officer, director, agent or person performing services for our company, or in its name, from giving or receiving bribes of any kind.

- Essity shall conduct its business in full legal compliance wherever it operates.
- Bribery and any other form of corrupt business practice are strictly prohibited. Neither Essity nor anyone acting on Essity's behalf may accept, authorize, promise, offer or make available any payments, gifts or other benefits that could inappropriately influence or appear to influence the objectivity in business decisions or the actions or decisions of a public official.
- Essity does not permit the making of facilitation payments to induce public officials to perform their duties.

3.2. Description of policy

3.2.1. Risk Assessment

Risk assessments or Business Practice Audits shall be carried out on a regular basis in order to accurately identify and prioritize the risks of corruption that Essity and the companies within the Essity Group may face in relation to specific countries. The risk assessments and the conclusions shall be accurately and appropriately documented. This is done together with Essity Internal Audit who documents and reports these to the Essity Audit committee.

3.2.2. Business Partners

In order to identify and prevent bribery risks, appropriate due diligence shall be carried out on customers, suppliers, distributors, intermediaries and other business partners. The procedures shall be proportionate to the risks identified. If the relationship lasts for a long time or if there are changes in circumstances repeated due diligence may be necessary.

Business partners shall be made aware of this Policy. In certain circumstances business partners shall be required to give anti-bribery warranties and similar consents.

3.2.3. Gifts, Entertainment and Hospitality

No Essity employee or any other person acting on Essity's behalf may promise, offer or grant gifts or benefits which would inappropriately influence, or appear to influence, the objectivity of the receiver to do something in return, such as awarding of a contract.

Gifts and hospitality may only be accepted when they comply with local Essity policy and procedures.

Giving, offering, receiving or soliciting gifts, entertainment and hospitality of high value which could be seen as influencing the objectivity are prohibited if they are:

- not approved in advance by a representative of Essity with appropriate authority;
- excessive or lavish by reference to the recipient, or in the context in which they are offered; or
- promised, granted or offered with the purpose of influencing a decision relevant to the business.

It is the responsibility of each HR Country Manager within Essity to implement detailed guidelines locally.

3.2.4. Public Officials¹

Neither Essity nor any person acting on Essity's behalf may offer a bribe of any kind to a public official or to any other person at the request or suggestion of a public official, or offer hospitality or gifts that are lavish or breach the gifts and entertainment policy by which the public official is bound.

3.2.5. Facilitation Payments

Facilitation payments are prohibited except under the rare circumstances of threat of violence or other pressure. Anyone that is asked to make a facilitation payment must report it to his or her manager, together with a description on the circumstances in which the payment was made.

3.2.6. Sponsorship

Payments in connection with sponsorship agreements should only be made in accordance with the Essity Community Relations & Sponsorship Policy and must be approved in advance by a representative of Essity with appropriate authority.

3.2.7. Charitable and Political Donations

Charitable donations must not be promised or granted with the purpose of influencing a decision relevant to the business of Essity.

Essity prohibits charitable donations to entities which are not established charities with recognized charitable aims.

Charitable donations must be approved by a representative of Essity with appropriate authority.

Corporate political donations are prohibited. Where a public official or customer or other business partner asks Essity to

¹ Public officials are people who perform a public function, e.g. judges, tax or customs officials, regulators, planning officers, legislators and employees of state-owned organizations, or international public organizations, such as the United Nations or the World Bank.

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make a charitable or political donation, this must be reported to Essity Legal. In such circumstances, charitable donations may only be made where appropriate due diligence has been carried out which has established that there is no suggestion that the donation is intended to influence a business decision, or other action or decision of a public official.

4. Change management of the policy

The content of this Policy shall be reviewed on a regular basis in order to ensure that the rules set out herein remain appropriate and in order to determine whether further guidance is needed.

5. Follow up of this policy

The observance of this Policy shall be regularly evaluated by Essity.

All employees within Essity shall receive information on this Policy. Employees working in higher risk functions, such as within customer or vendor facing roles, e.g. sales, marketing and procurement, employees having contact with public officials, e.g. plant managers, environmental officers and project managers and employees working in high risk countries or where it is otherwise relevant shall also participate periodically in appropriate training sessions.

It is the responsibility of each manager within Essity to ensure that its employees are informed, understand and adhere to this Policy.

Essity shall provide its employees with secure and accessible channels through which they may raise concerns and report violations of this policy in confidence without risk of retaliation.