



STORA ENSO BUSINESS PRACTICE POLICY REFERENTIALS June 2016

INSTRUCTIONS FOR RESPONSIBLE PERSONS AND DEPUTIES

Each Stora Enso office and production facility shall have one person to represent Stora Enso in case of a dawn raid inspection (a "**Responsible Person**"). In addition, at least two deputies shall be appointed by the Responsible Person. The Responsible Person shall ascertain that the identities of the Responsible Person and the deputies are kept up to date on this [list](#). In the event that an office or production facility fails to appoint its Responsible Person, Legal, Ethics and Compliance shall make the appointment.

A dawn raid is one of the most stressful events that a company can face in its daily business. Against this background, it is important that all Responsible Persons and deputies are as prepared as possible. The Responsible persons and deputies have a great responsibility with regard to coordinating staff, external lawyers and the inspectors, and the following overview lists suggested measures that the Responsible Persons and deputies may take at any time in order of preparation and to facilitate the burden should a dawn raid ever occur.

Duties of the Responsible Person

- The Responsible Person shall, as soon as he or she is aware of the inspection, contact Legal (and contact local external counsel if a relationship is established). This shall be mentioned to the inspectors who, however, cannot be required to wait for an undue period of time;
- The Responsible Person shall also contact the divisional management of the relevant business as well as Stora Enso Communications;
- The Responsible Person shall check the personal identification of the inspectors;
- The Responsible Person shall check the credentials of the inspectors in order to find out the scope of the inspection in respect of the alleged infringement(s) and in respect of the relevant:
 - companies subject to the inspection and their addresses;
 - date of the inspection;
 - products;
 - countries;
 - time periods; and
 - documents.
- Within the EU, the inspectors can be empowered to carry out the inspection by either an Authorization or a European Commission Decision. A company is only legally obliged to submit to an inspection where the inspectors are acting under a European Commission Decision. However, it is Stora Enso's policy to cooperate with the inspectors and no decision should be taken to refuse to cooperate with an inspection or to withdraw cooperation with such an inspection without taking legal advice;
- The Responsible Person shall appoint one person to assist with administrative matters and two persons that can accompany each of the inspectors when they are conducting the inspection. One person shall take notes while the other person assists with copying etc.;
- The Responsible Person shall set aside a room to be used for the collection of the files and papers the inspectors wish to read and also to be used for them when they ask relevant questions, as well as arrange for photocopying. Ascertain that the room does not contain any documents or archives;
- The Responsible Person shall set aside a room to be used by external lawyers and Stora Enso employees to which they can retreat at any time during the inspection, and where a debriefing session shall be held after the inspectors have left the premises. At the debriefing session, all note takers shall report what has happened during the inspection;



- The Responsible Person shall collect copies of all notes and documents that have been copied and handed to inspectors, and ascertain whether any confidential information has been provided to the authorities;
- The Responsible Person shall inform the inspectors that Stora Enso requests to be present during all searches of digital material after indexation and agree with the inspectors how this will be done, i.e. if it should be done on or off-site; and
- The Responsible Person shall advise the inspectors that some of the documents they have requested may contain confidential information and that the inspectors, following the investigation, will be supplied with information on which documents that are confidential.

Suggested preparatory measures

The following measures are voluntary, however, we strongly encourage all Responsible Persons and deputies to implement as many of them as possible. ***It should be noted that taking these suggested measures will not relieve the Responsible Persons and deputies from any ultimate responsibility.***

1. Decide which room ("Room A") the inspectors should be located to, and inform the reception that the inspectors should be escorted here shortly after their arrival.
 - 1.1. If Room A is busy, the reception should kindly ask the relevant persons to take a different room.
 - 1.2. Inform the reception not to hinder the inspectors should they wish to start the inspection.
2. Decide to which room ("Room B") external lawyers and Stora Enso employees should retreat, and inform the reception.
 - 2.1. If Room B is busy, the Reception should kindly ask the relevant persons to take a different room.
3. Instruct the reception to start calling people in a specified order to inform of the dawn raid and ask that they come to Room B as soon as possible.
 - 3.1. Prepare a calling list containing phone numbers to Legal, external counsel, divisional management, Communications, etc.
4. Instruct the reception to take copies of the inspectors' personal identifications.
5. Instruct the reception to take copies of the decision to conduct the inspection.
 - 5.1. Instruct the reception to verify that the decision states that inspection shall take place at the relevant:
 - Premises (need to check address)
 - Date(s)
6. Appoint one or two persons to be in charge of administration and the selection of persons to accompany each inspector.
 - 6.1. Include these persons on the calling list mentioned at 3.1

In the event that the Stora Enso office does not have a reception, the Responsible Person and deputies may also delegate the above measures to staff which would normally be in the office, as appropriate.