Dear Dawn Raid Responsible Person,

The purpose of this manual and package is to provide support if an unannounced inspection by a competition authority takes place at Stora Enso's premises (normally referred to as a "dawn raid" inspection). You may, however, also use these instructions as guidance in the event of an inspection by any other public authority, for example in the event of an unannounced data privacy or tax investigation.

Please take your time to read through this so you are familiar with the situation and what actions need to be taken in case of a dawn raid.

In the following you will find useful information for your knowledge and preparations as well as instructions and checklists in case a dawn raid takes place.

Always keep the checklist with instructions in an easily accessible place and make sure that you have the latest available version.

In case there is an actual dawn raid taking place, please proceed directly to the Dawn Raid Checklist at section 3 and follow the instructions.
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1. Relevant Sections from Stora Enso Business Practice Policy

Also available at: https://dwr.storaenso.com/competition-law/#three-six

3.6 Investigations

Handling enquiries from the competition authorities

Stora Enso’s policy is to cooperate fully with the investigations of the competition authorities.

In order to ensure that any investigation is conducted legally, properly and on time, and in order to take into account the experiences of the entire Group, any investigation, written request for information or request for information by telephone should be referred to Legal immediately and any reply should be given via Legal.

Competition authorities have far reaching rights to request information when investigating anti-competitive behaviour or assessing various kinds of mergers.

Handling dawn raid inspections at company premises

An unannounced inspection by a Competition Authority is normally referred to as a “dawn raid” inspection.

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.

Under EU legislation, inspectors from the European Commission have the right to:

- Enter any company premises and seal them as necessary. The European Commission can also conduct an inspection in any other premises, land or means of transport, including the private homes of directors, managers and other members of staff, if a reasonable suspicion exists that books or other records related to the business and to the subject matter of the inspection, which may be relevant to prove a serious violation of EU competition legislation, are being kept there.

- Examine and take copies of all the books and other records related to the business, irrespective of the medium on which they are stored. The inspectors are, however, only entitled to obtain materials on matters that fall within the scope of the investigation:
  - Notes shall be made of all files and documents examined by the inspectors, whether or not the inspectors want copies to be taken; and
  - Each document photocopied shall be copied in three copies: one for the inspectors, one for Stora Enso and one for Legal.Ascertain that each document is restored in its initial position after it has been copied.

- Ask any representative or member of staff for explanations on facts or documents, relating to the scope of the investigation, and to record the answers:
  - If the inspectors ask questions it is normally the company (not the inspectors) that is entitled to decide who should provide the explanation, but if the inspectors demand to speak to a specific person who logically could easily provide an explanation, such as the author of a document, the person should be made available to the inspectors;
  - If the best qualified person is not available, or if the information necessary to answer the question is not available, this shall be explained to the Inspectors with an offer to provide the explanation later in writing;
  - If questions are answered they should be answered as to facts but without any assessments and if the answerer is uncertain this should be mentioned;
  - Detailed notes shall be made of all oral explanations concerning records requested by the inspectors and of the explanations given. A copy of the notes taken by the inspectors shall be requested; and
When possible, a lawyer shall always be present during any form of interview with Stora Enso employees.

- Search a company’s IT environment (servers, desktop computers, laptops, tablets and other mobile devices) and all storage media (CD-ROMs, DVDs, USB-keys) using both the European Commission’s own hardware and software and the search tools built into the company's media. This covers also private devices used for business purposes (BYOD), external hard drives, backup tapes and cloud-computing services. The inspectors may make an integral copy of a digital storage medium;

- If the inspection is not finished during an on-site inspection, the European Commission can copy the data set, secure it in a sealed envelope and invite company representatives to be present when the sealed envelope is later opened at the European Commission’s premises. Alternatively, the European Commission may decide to return the sealed envelope to the company for safekeeping until further notice;

- The company will receive a data carrier (e.g. a DVD) on which all final data selected by the inspectors are stored and it will be requested to sign printed lists of data items selected; and

- Personal data, e.g. names, telephone numbers and e-mail addresses of employees, although not being the targets of the inspection, may be copied and obtained by the officials if included in business documents.

On the other hand, inspectors from the European Commission do not have the right to review and take copies of documents:

- That contains communication between Stora Enso and external lawyers. Documents to or from external lawyers (i.e. not in-house lawyers) are protected by attorney-client privilege. Any such documents should be clearly marked as containing attorney-client communication;

- That contains commercial secrets of a technical nature; or

- That falls outside the scope of the inspection.

Any disagreements between Stora Enso and the inspectors regarding whether e.g. a document is covered by legal privilege shall be written down in a detailed note.

For the avoidance of doubt it should also be stated that the powers of national authorities are at least broadly similar to the powers of the European Commission.

In order to protect the legal interests of Stora Enso and in order to make sure that a dawn raid inspection is conducted legally and properly the following shall be noted:

**Reception/Arrival**

- When inspectors arrive at company premises, they normally go to the reception desk, identify themselves and ask to see a senior manager. The receptionist or security personnel at the reception should immediately contact the Responsible Person or, in his or her absence, one of the deputies; and

- The inspectors should remain in the reception until the Responsible Person and when possible, a member of Legal come to meet them. If the inspectors believe that they are being unreasonably delayed at reception, it may result in the company being fined for failure to cooperate. Therefore the inspectors should be dealt with promptly and courteously at reception.

Instructions to Responsible Persons and deputies are available [here](#) (and below).

**Under no circumstances should Stora Enso’s staff provide any false or misleading information to investigators, tamper with or destroy documents during an investigation, break a seal affixed by investigators or endeavor to hinder the investigation in any way.**
2. Instructions and suggested preparatory measures for Responsible Person and deputies

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.
3. Instructions and checklists for Ongoing Dawn Raid

The following instructions will help you in case inspectors from the European Commission or a national competition authority make a visit to Stora Enso to carry out an unannounced inspection (dawn raid).

Make sure that everyone involved in the inspection from Stora Enso’s side have access to the right checklist. Follow the instructions set out for your area of responsibility and proceed in a business-like and professional manner.

Checklists by area of responsibility

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<th>Checklists by area of responsibility</th>
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<tr>
<td>2.B. Checklist for Dawn Raid Responsible Person and Deputies</td>
<td>[link here]</td>
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<tr>
<td>2.C. Checklist for Inspection Shadows (SE employees or external counsels, with the task to “shadow” the competition authority inspectors during a dawn raid inspection)</td>
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<tr>
<td>2.D. Checklist for Communication department</td>
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<td>2.E. Checklist for IT department</td>
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<td>2.F. Checklist for Legal</td>
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Other attachments

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<tr>
<td>3.A. Contact Details to Internal Counsels and Departments</td>
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<tr>
<td>3.B. Contact Details to External Counsels</td>
<td>[link here]</td>
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<td>4.A. Template Protocol for Searched Documentation</td>
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4. General Do’s and Don’ts in Case of a Dawn Raid

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<th>GENERAL DO’S</th>
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<tr>
<td>Do remain calm, polite and helpful towards the inspectors.</td>
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<tr>
<td>Do remember that Stora Enso’s policy is to cooperate fully with the investigations of the competition authorities.</td>
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<tr>
<td>Do remember that Stora Enso is under a legal duty to submit to the inspection and has a general duty to co-operate. It is in the best interest of Stora Enso to create an impression of open co-operation whenever possible.</td>
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<tr>
<td>Do make sure the inspectors are accompanied at all times.</td>
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<td>Do request Legal to be present in interviews.</td>
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<td>Do assist the Responsible Person or legal counsel during the inspection.</td>
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<tr>
<td>When in doubt, do ask for help from the Responsible Person or Legal.</td>
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<th>GENERAL DON’TS</th>
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<tr>
<td>Do not keep the inspectors hanging around too long in the reception.</td>
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<td>Do not resist or obstruct of the investigation.</td>
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<td>Do not adopt a defensive attitude to the inspectors.</td>
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<td>Do not volunteer any information beyond what is asked.</td>
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<td>Do not modify, hide or destroy possibly incriminating documents, including e-mails and electronically stored information in any circumstances or remove them from the premises.</td>
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<td>Do not delete files from your computer, even if they are private or embarrassing.</td>
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<td>Do not sign anything without first obtaining legal advice.</td>
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<tr>
<td>Do not warn third parties of the investigation (other than Stora Enso’s external legal counsel).</td>
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<tr>
<td>Do not discuss the inspection with anyone outside of Stora Enso (e.g. if contacted by the media).</td>
</tr>
<tr>
<td>Under no circumstances should Stora Enso’s staff provide any false or misleading information to investigators, tamper with or destroy documents during an investigation, break a seal affixed by investigators or try to hinder the investigation in any way.</td>
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5. Local Dawn Raid Regulations

Supplementing the general instructions presented above in sections 2-4.

Germany

The powers of national competition authorities, in particular of the German Federal Cartel Office ("FCO"), are generally very similar to those of the European Commission. The powers of the FCO that significantly differ from those of the European Commission are described in the following.

- With regard to the powers to examine and take copies of all books and other records related to the business, irrespective of the medium on which they are stored, the FCO is not restricted to making copies of documents and other records, but they have the right to seize any hardcopy document or data carrier in its original state. Moreover, the FCO is not obliged to allow company representatives to make copies of the records seized.
  - In the case that FCO inspectors intend to seize original documents, it is of utmost importance that company representatives generate a cooperative atmosphere and obtain the inspectors’ consent for making at least one set of copies of the documents to be seized for further internal use (preferably two copies: one for Stora Enso and one for Legal).
  - The FCO also has the right to seize data carriers in its original form. In order to avoid seizure of the company’s IT hardware, employees should volunteer all relevant passwords in order to allow the FCO inspectors to make copies on site.
- With regard to the powers to ask for explanations on facts, in the case of an inspection by the FCO questions regarding the alleged infringement do not have to be answered. Each employee has the right to remain silent. Only questions regarding personal information (first name, last name and maiden name, place and date of birth, marital status, place of residence/domicile and nationality) must be answered. However, in the interest of a cooperative atmosphere inspectors’ questions should be referred for a response by the best qualified person and, respectively, providing a response later in writing should be offered.
- Any disagreements between Stora Enso and the inspectors regarding whether e.g. a document is covered by legal privilege shall be written down in a detailed note and the respective documents should be sealed in an envelope marked "legally privileged documents". In case of an FCO inspection, the remark "inspection by authorities only permissible with a court decision" might be added.

Duties of the Responsible Person

- The Responsible Person shall check the personal identification of the inspectors and note their names and official capacity. In case of an inspection by the European Commission, the acting inspectors are named in an official decision and will present an ID card identifying them as officials of the European Commission. Inspectors of the FCO are not named in the respective court warrant and will identify themselves by government ID of the FCO.
- In case of an inspection by the FCO, the inspectors are empowered by a court warrant/seizure order (Durchsuchungs-/Beschlagnahmebeschluss) by the Local Court of Bonn (Amtsgericht Bonn) or, alternatively, by an order of a FCO’s Decision Division. In case of the latter, Stora Enso is merely obliged to tolerate the entering of the premises, but an independent search and seizure of documents may only be conducted if the senior investigating official orders a search due to imminent danger. If such an order is not given by the FCO inspector, we are only obliged to bring the requested documents to the FCO officials.
- The Responsible Person shall in case of a FCO inspection make an inventory of documents, files, devices and/or storage media seized.
- At the end of an inspection carried out by the FCO, the Responsible Person must ensure that an objection against the seizure of documents is explicitly entered into the minutes of the inspection in writing. Under no circumstances should a company representative declare that it formally waives the right to raise such an objection.