

Group Business Integrity Policy

Introduction

At Mondi, we are committed to conducting business with integrity and fairness, with respect for the law and our values.

Regrettably, fraud, bribery and corruption are features of corporate and public life in many countries across the world. Even the suggestion of such behaviour may damage the reputation of a company or Group and affect its ability to do business. Regional and international institutions, such as the OECD, the United Nations and the African Union, have responded to fight the negative impact of corruption with conventions intended to harmonise anti-corruption laws across jurisdictions. Mondi is aware of its corporate responsibility and supports the actions being taken to create sustainable corporate integrity.

We do not tolerate any such activity by Mondi personnel, contractors, consultants, agency staff, agents or those with whom we do business. All activities under Mondi's control, no matter where in the world, shall be conducted in an ethical manner. We do not tolerate any form of fraud, bribery or corruption. Mondi will neither give nor accept bribes nor permit others acting on its behalf to do so.

Our corporate conduct is governed by our Code of Business Ethics (the "Code") (see appendix to this policy for a copy of the Code). The Code is supported by this policy, which sets out Mondi's approach to business integrity in general, and its expectations and commitments to ethical behaviour and lawful conduct across its operations.

The Board has approved this policy and has delegated responsibility for oversight of the policy to the Audit Committee.

In addition to compliance with this policy there is a duty to comply with the laws and regulations of the countries and jurisdictions in which our employees, customers, agents, consultants and suppliers operate.

If you have reason to suspect misconduct or non-compliance with this policy, you have a duty to raise your concerns. Please refer to the 'Reporting violations' section below.

Scope

All Mondi employees and any person who performs services and/or acts for and on behalf of Mondi, including contractors, consultants, agency staff, agents, suppliers and business partners ("Persons associated with Mondi") are required to adhere to this policy, irrespective of the jurisdiction they operate in and the laws applicable to such jurisdiction (where this policy represents a higher standard). Non-compliance may result in disciplinary action being taken which may lead to termination of employment, and/or to the termination of a third party contract (as the case may be).

This policy encompasses the following key risks:

- Bribery
- Facilitation payments
- Interactions with Government officials and lobbying
- Gifts, entertainment and hospitality
- Political donations and social investment including charitable donations

- Conflicts of interest
- Misuse of company assets
- Facilitation of tax evasion
- Failure to prevent fraud

Each of these areas are explained in more detail in the appendices to this policy.

Specifically relating to bribery and corruption, this policy refers to all kinds of corrupt practices, including but not limited to:

1. Active bribery – the giving, promising or offering of a bribe;
2. Passive bribery – the requesting, agreeing to receive or accepting of a bribe;
3. The bribing of any public or Government official;
4. Illicit enrichment – misuse of company assets;
5. Facilitation of tax evasion – deliberately and dishonestly taking action to facilitate tax evasion; and
6. Fraud – any dishonest act committed with the aim of obtaining anything of value or securing an advantage.

This policy should be implemented in conjunction with the Mondi Code of Business Ethics and other related policies.

Responsibility

The Group Chief Financial Officer is the main board director with primary responsibility for overseeing the implementation of this policy and for reporting annually on the status of and adherence to this policy to the Audit Committee and Board.

Each business unit will establish appropriate responsibilities and further procedures within their operations to ensure that this policy is fully implemented and that any instances of violation of the policy are reported in accordance with the requirements detailed below.

It is incumbent upon all lines of defence to promote integrity and fairness, and respect for the law and our values. This needs to be under-pinned by a sound internal control environment, coupled with robust assurance processes (from internal and external audit). Compliance with defined policies and procedures is essential for managing the risks set out in this policy.

Should any instances of misconduct, including fraud, bribery or corruption, be identified, remedial steps will be taken immediately. These steps include:

- Reporting of the possible case according to the reporting procedures shown below.
- Considering the country specific legal requirements for investigation activities – taking legal advice is recommended.
- Ensuring confidentiality to enable effective investigation and to protect Mondi's reputation.
- Safeguarding evidence and data to enable Mondi to take legal action in cases where management decide to do so.
- Identifying and remedying weaknesses in procedures and systems to prevent further losses.
- Taking all appropriate actions to recover lost assets and to secure evidence for a possible criminal conviction.

- Taking appropriate disciplinary action and a consistent zero tolerance approach.

Mergers, acquisitions, joint ventures and associates

This policy must be considered when entering into new business relationships, either through mergers, acquisitions, joint ventures or new customers and suppliers. Such new relationships require careful assessment of the ethical conduct and reliability of any business partner.

Periodically Mondi explores opportunities to acquire companies and to enter into partnerships and joint ventures. As part of the commercial and financial due diligence process of such transactions the background, reputation, ethical and cultural values of any company we aim to invest in or acquire, should be thoroughly investigated. We need to be sure about what we may be inheriting.

Failure to conduct appropriate fraud, anti-corruption and compliance due diligence may create liabilities for Mondi resulting from prior or ongoing malpractice by the third party business.

All Mondi Group companies and business units worldwide, including joint ventures where we have a controlling interest are required to apply this policy and its principles. Where we have a non-controlling interest, we should encourage the application of this policy with our business partners.

Business interfaces

Given the risk inherent in existing business relationships, a thorough review of third parties who provide services on behalf of Mondi including contractors and other regular counterparties and possibly suppliers and customers, should be undertaken on a regular basis to assess their background, reputation, ethical and cultural values.

Training

Training will be provided on this policy, its content and its implementation and will be tailored to the risks identified. In particular, it is anticipated that formal training of all employees involved in procurement, sales or other functions that require regular involvement with business counterparties, covering the contents, application and consequences of this policy, should be undertaken as soon as practicable after the approval of this policy and at regular intervals thereafter.

Sanctions

Violations of this policy will not be tolerated. While identified violations will be reviewed on a case by case basis, should any instances of bribery, corruption or other misconduct under this policy be identified, appropriate steps will be taken immediately. This may include a review and revision of the business relationship, legal claims or disciplinary action in accordance with the Mondi Group disciplinary procedures. Such disciplinary action may lead to termination of employment.

Disciplinary action may also be instigated for instances of a failure to report a known violation of this policy.

Appropriate action will also be taken vis-a-vis counterparties involved in any breach of this policy, including those with regard to contracts concluded with such parties. This may result in the termination of a third party contract.

Legal penalties

Violations of this policy may result in legal penalties not only connected to where the violation has occurred, but also under the applicable legislation in the UK.

The maximum penalty for active bribery, passive bribery and bribing a foreign public official, under current legislation (e.g. under the UK Bribery Act), is 10 years imprisonment and/or an unlimited fine.

If a company is found to have given or received a bribe or to have bribed a foreign public official with the knowledge of a senior officer, that senior officer could face prosecution leading to a fine and/or imprisonment. A company may be subject to an unlimited fine.

If a company is found guilty of failing to take sufficient measures to prevent fraud or the facilitation of tax evasion, UK regulators can impose unlimited fines and other regulatory sanctions. This is in addition to any penalty that may apply to the individual involved.

Compliance

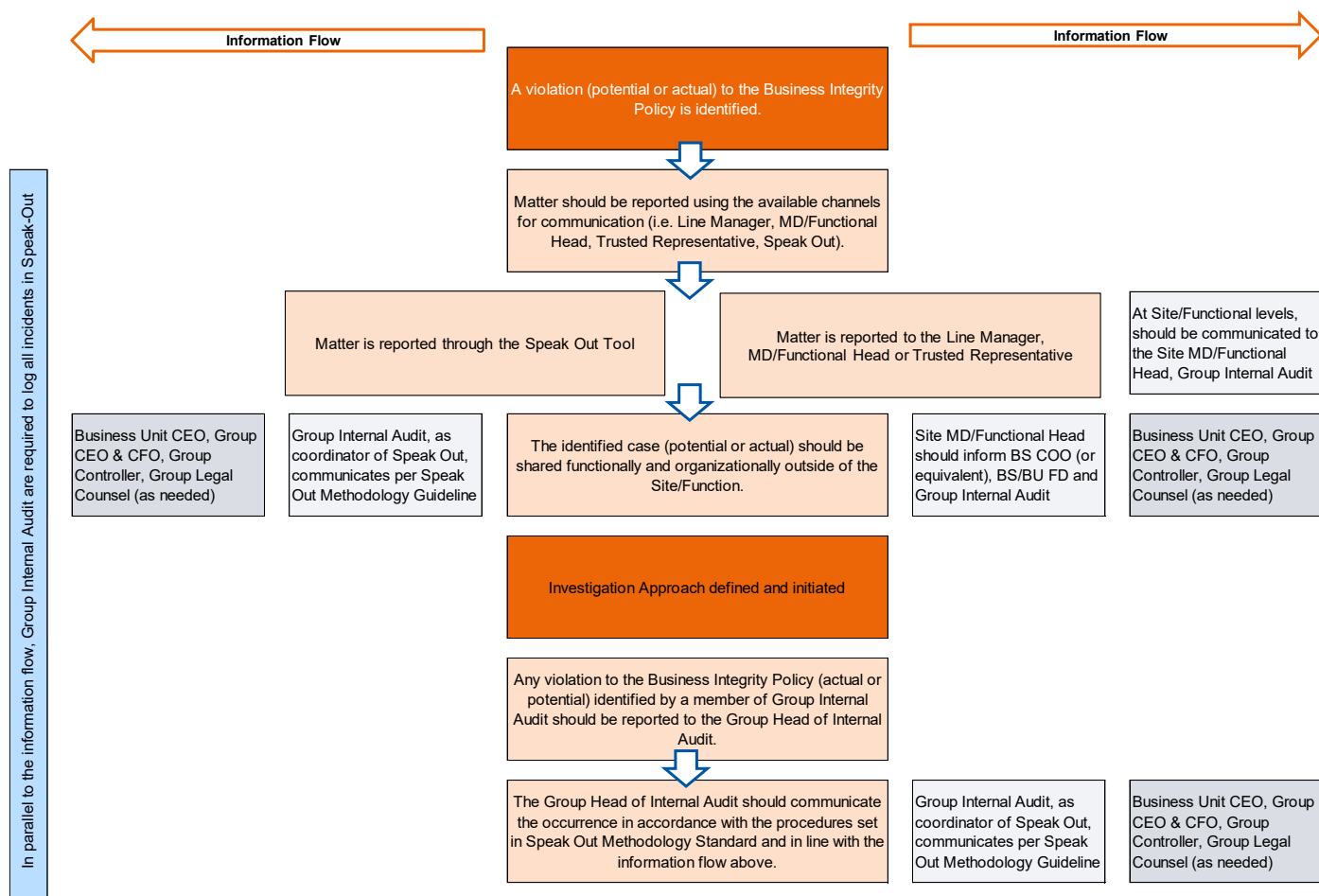
As part of the six monthly internal control confirmation procedure, employees shall be required to confirm their compliance with this policy.

In addition, independent verification of compliance with this policy is within the scope of the Group's Internal Audit activities and reporting to the Audit Committee.

Reporting violations

All stakeholders are encouraged to raise any genuine concerns about suspected violations of this policy. Known breaches of this policy must be reported.

When a suspected violation of this policy is identified, the following communication steps should be followed. If the instance of misconduct involves any of the identified people to whom to report to, then these should be reported one level further up within the organisation hierarchy, thus ensuring an adequate level of independence.



Alternatively, possible violations of this policy may be reported through the SpeakOut facility, which is available across Mondi and to all Mondi stakeholders.

SpeakOut is an anonymous whistleblowing platform operated by an independent third party (People in Touch). It is monitored by Group Internal Audit and overseen by the Board and Audit Committee. All reported incidents will be reviewed and assessed. The assessment will be performed by Group Internal Audit in conjunction with the appropriate business representatives based on the topic/type of incident, employees concerned and estimated severity. The approach to assessment, categorisation and investigation is set out in the SpeakOut investigation guidelines. SpeakOut contact details can be found on planetmondi and at www.mondigroup.com.

A detailed register of all reported incidents will be maintained by Group Internal Audit. In line with the Group Internal Audit Charter, at least quarterly, Group Internal Audit will report all completed investigations to the Audit Committee, including the outcome and any remedial action plans.

Mondi will not tolerate any form of retaliation against any person raising concerns in good faith. If a person reports concerns and seeks advice in good faith, they will always be supported by Mondi. Any type of retaliation identified in these circumstances is considered a violation of this policy and will be treated as such.

In all instances, consideration will be given to whether advice is required from external legal counsel.

Monitoring and review

This policy will be enforced through regular monitoring and review and will be supported by the required resources, including Group-wide policies, standards and guidelines. Adherence to this policy will be monitored as part of the Group's internal audit activities.

Queries

Should you have any questions regarding this policy or the supporting principles please contact:

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APPENDIX 1

BRIBERY

Policy

No employee or Persons associated with Mondi shall offer, provide, authorise, request, or receive bribes (as defined below) or anything which may be viewed as a bribe either directly or indirectly to or from any third party, whether or not such third party is a commercial party or a public official. No employee or Persons associated with Mondi may perform his or her functions improperly in anticipation or in consequence of any bribe.

What do we mean by bribery?

A bribe can include money, or any offer, promise or gift of something of value or advantage. It need not necessarily be of large value. It might include incentive programs, signing bonuses or overpaying government suppliers. It might also include intangible benefits such as the provision of information or advice or assistance in arranging a business transaction.

In summary, a bribe is any financial or other advantage which is offered, provided, authorised, requested or received as an inducement or reward for the improper performance of a person's relevant function or the receipt of which is itself improper.

For these purposes, a 'relevant function' can include any function of a public nature, any activity connected with a business, any activity performed in the course of a person's employment and any activity performed by or on behalf of a body of persons (e.g. a company). Any such function is performed 'improperly' by a person if they perform it in breach of what would be expected of them by a reasonable person by reference to any applicable requirements of good faith, impartiality or any position of trust which that person may hold.

What about public officials?

Specific rules apply to dealing with "public officials" (as defined in this policy). It is important to note that public officials include any employees of government-owned or government-controlled entities. The risk of committing a bribery offence is particularly significant in any business that involves public officials or government-owned or government-controlled entities. A bribe in this context can also include offering or providing such officials any financial or other advantage in order to influence them for the purpose of obtaining an advantage. This can include influencing a public official to do something which is within the scope of their public duties or which they may otherwise have done in any event.

Each Mondi employee and Persons associated with Mondi is responsible for knowing and understanding the scope of this policy and the scope of the applicable law in any relevant country of operation, including understanding whether any particular person with whom they are dealing is a "public official."

What is the definition of a public official?

Under this policy, Public Officials include:

- any officer, employee or representative of, or any person otherwise acting in an official capacity for or on behalf of a government authority;

- any employee of a government-owned or government-controlled entity;
- a legislative, administrative or judicial official, regardless of whether elected or appointed;
- an officer of, or individual who holds a position in, a political party;
- a candidate for political office; or
- a person who otherwise exercises a public function for or on behalf of any country.

In practice, this can include civil servants, inspectors, members of a political party, employees of a state university, judges, customs and immigrations officials, ambassadors and embassy staffs, and law enforcement personnel.

Under this policy, a Government Authority includes:

- national governments, political subdivisions or local jurisdictions;
- civil or military government agencies and their instrumentalities;
- government-owned or government-controlled associations, organisations or enterprises, including state-owned companies;
- legislative, administrative or judicial offices;
- political parties; or
- supra-national organisations (such as, for example, the World Bank, United Nations, International Monetary Fund, OECD).

Examples

- i. A Mondi employee offers to pay an amount of money to a representative of a potential customer in exchange for that representative awarding a tender to Mondi.
- ii. An agent offers an inducement to a foreign public official in order to secure government approval to award a permit.

APPENDIX 2

FACILITATION PAYMENTS

Policy

Mondi will not, and will not tolerate others acting on its behalf to, make facilitation payments to third parties not legally entitled thereto.

What do we mean by facilitation payments?

Facilitation payments are (relatively small) unofficial payments made to secure or expedite the performance of a routine or necessary action, usually by public officials, to which the payer of the facilitation payment has legal or other entitlement. Such payments often occur by the recipient extorting the payment using the power of his or her official position and where the consequence of not paying may be out of all proportion to the small payment demanded. Payments or fees required by law are not facilitation payments and are permissible.

If you are asked to make a payment, you should try to establish whether the payment or fees are required by law. For example, ask to speak to the public official's supervisor or ask for evidence that the payment is lawfully required. If the payment cannot be verified or the official is not willing to provide a receipt, it should be assumed that the payment is not permitted. If you require advice as to whether to make the payment, please contact Mondi's General Counsel.

If refusing to make a facilitation payment results in some costs or delays being incurred, this is accepted as a normal consequence of this policy.

Exception

While Mondi has a zero tolerance policy to bribery and corruption in all its forms, we do recognise that there may be exceptional emergencies where an employee is under threat of violence or personal harm. Put safety first, make the payment and report the circumstances and amount of the payment immediately in accordance with the reporting procedures set out on page 5. The details of any such payments made will be recorded.

Examples

- i. An immigration official demands €50 'entry fee' from an employee at an airport used frequently by company employees to be allowed entry to the country, even though the employee's passport and visa are all in order.
- ii. A customs official demands €150 to give priority clearance to goods arriving in port even though all import duties and paperwork are in order.

APPENDIX 3

INTERACTIONS WITH GOVERNMENT OFFICIALS AND LOBBYING

Policy

Mondi employees and Persons associated with Mondi will conduct all dealings with governments and public officials in a transparent and ethical way, promoting honest and constructive engagement. The risk of committing a bribery offence is particularly significant where you are involved in business involving public officials and this policy sets stringent procedures in relation to your interaction with them. Please refer to Appendix 1.

What do we mean by interactions with Government officials and lobbying?

During Mondi's normal business activities there will routinely be interaction with government bodies and public officials. Some business outcomes will be dependent upon how we deal with the relevant government department, ministers or public officials. All such dealings must be carried out in a transparent and ethical way.

Examples

- i. A lobbyist requests payment up front to 'oil the wheels'.
- ii. A government official who is potentially able to influence business outcomes requests a donation to be made to a charity in which they have an interest.

APPENDIX 4

GIFTS, ENTERTAINMENT AND HOSPITALITY

Policy

Mondi employees and Persons associated with Mondi will not offer, give or receive any gifts (including those in the form of entertainment) or hospitality which are intended, or may be construed, as a bribe, or which may place, or be perceived to place (directly or indirectly) the recipient under an obligation towards the party offering or giving such gift or hospitality.

Policy on giving gifts and business courtesies

1. Only modest gifts and entertainment that are business courtesies, reasonable and proportionate, designed to build relationships and goodwill in an appropriate way, should be offered. They should not obligate a recipient.
2. Conflicts of interest, or the appearance of conflicts of interest, should be avoided for a recipient.
3. You should not gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical or inappropriate.
4. You should not, directly or indirectly, gain any personal advantage, pecuniary or otherwise.
5. Gifts of money or cash equivalents must never be given.
6. Gifts and entertainment to public officials should be avoided wherever possible.

Policy on receiving gifts and business courtesy

1. Reasonable and proportionate business-related modest gifts or entertainment that are business courtesies and conducted in the best interests of Mondi and foster business discussions and relationships may be accepted.
2. Such gifts or entertainment should not obligate you or influence your decisions to Mondi's detriment.
3. The recipient should not be offered any business or personal advantage over others as a result of receiving the gift or entertainment.
4. Gifts of money or cash equivalents must never be accepted.

What do we mean by gifts and hospitality?

'Gifts and hospitality' means anything of value e.g. tickets, transport, accommodation, meals, etc.

While the exchange of gifts and hospitality can build goodwill in business relationships, if done inappropriately it can create improper influence or a conflict of interest (or the appearance of improper influence or conflict). This policy aims to ensure that Mondi acts professionally and in a manner that will stand up to scrutiny consistent with its corporate responsibilities in the marketplace.

Mondi should be, and should be seen to be, free from bias in all its dealings and transactions with its suppliers, customers, potential customers and other relevant third parties.

Further Guidance

Mondi recognises that laws and market practices may vary across the jurisdictions in which it does business and what is considered acceptable may vary. This policy prohibits the giving or

receiving of gifts and hospitality that would result in a personal / business gain or advantage to the recipient, giver or anyone connected with them.

Always adopt a common sense approach and consider the intent, materiality, frequency, legality, transparency and also the rules of the other party when giving or receiving gifts or entertainment. Also consider the timing of any business courtesy. If given or received around the time of a contract negotiation then there is more likelihood of a negative interpretation.

Any gift or hospitality given or received of €250 or above (or the local currency equivalent) must be approved by the individual's line manager and be recorded in a register via the Group-wide online system for this purpose. Lower limits may apply in certain instances and the thresholds in the Implementation Policy must be followed. Notwithstanding this, the general principle is that, no matter what the sum involved, any gift or hospitality given or received must not deflect you from performing your responsibilities to Mondi in a correct and ethical manner.

Gifts and entertainment that are sufficiently modest may be deemed acceptable e.g. modest occasional meals with people with whom Mondi does business; occasional attendance at sporting and cultural events or the theatre; and gifts where the value is nominal or they are small promotional items.

Hospitality that is frequent, disproportionately long or lavish should not be accepted or offered.

If you are in any doubt regarding the acceptance of gifts or hospitality they should be returned or declined with a note advising that acceptance would be contrary to Mondi's policy. Alternatively, if matters are not clear or you consider that it may give rise to a business problem then please refer the matter to your line manager.

Examples

- i. Accepting an invitation from a customer on an 'all expenses paid' basis to a sporting event in a distant location that would, for instance, require transport and/or accommodation, would not be acceptable.
- ii. A programme of annual events including attendance at various sporting events as an expression of appreciation for long established business partners where those business partners pay for their own travel and accommodation, would be acceptable.

APPENDIX 5

POLITICAL DONATIONS

Policy

Mondi employees and Persons associated with Mondi will not make any political donations, contributions or incur any political expenditure on Mondi's behalf, in any form, whether to political parties, causes or to support individual candidates, anywhere in the world.

What do we mean by political donations?

Direct or indirect contributions to political parties, other political organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions.

A political contribution, financial or in kind, to support a political cause.

One area where great care will need to be exercised is where the Group acquires a new subsidiary company. Careful due diligence will need to be carried out to establish whether any political donations have been made or political expenditure incurred prior to acquisition.

Exception

The making of political donations is a matter that is reserved for the Board.

We recognise the rights of individuals to participate in the political process, acting in a personal capacity.

Employees must not, however, use Mondi time, property or equipment to carry out or support those personal political activities.

Subscriptions to, and activities for, trade and industry associations and donations to trade unions are not deemed 'political donations' for the purposes of this policy.

Examples

- i. Making a financial donation to a political party participating in an election.
- ii. Donating Mondi paper or other equipment at a reduced cost or free of charge to a political party or organisation or a candidate standing for election.
- iii. Purchase of tickets for an event that is intended to fundraise or generate support for a political party or organisation or a candidate standing for election.
- iv. Sponsorship of any event or activity (such as a sporting event) organised by a politician or political party or which could be perceived as a political donation.

APPENDIX 6

SOCIAL INVESTMENT, INCLUDING CHARITABLE DONATIONS

Policy

Mondi's Community Policy outlines our commitment to facilitate, invest in and participate in initiatives and projects that add value to communities and support the development of local communities. We will ensure that our social investments are guided by the development needs of local people, principles of sustainable development and our own business objectives in the countries in which we operate. We do not make social investment that could be considered unethical, in particular involving dealings with government officials, politicians and others of influence.

What do we mean by social investment, including charitable donations?

Social investments, including charitable donations, are contributions that Mondi makes to bring benefits to communities and external groups over and above benefits available through the core business or operational expenditure. They shall be connected to Mondi's strategic focus areas – education, employment and enterprise support, health and wellbeing, infrastructure and community development and environmental protection.

Social investments can be made in the form of direct financial contributions, contributions in kind and/or employee time. Cash payments to individuals should be avoided. It is important in all cases that we act transparently, ethically and in good faith.

Care needs to be taken in situations where, for example, in connection with a tender, collateral investment in the local community is requested by a public official. Legal advice should always be sought in such situations.

For details on the approval process, authority limits, documentation and reporting requirements, please also refer to the Social investment Practice Note.

APPENDIX 7

CONFLICTS OF INTEREST

Policy

Mondi employees and Persons associated with Mondi will avoid actual or perceived conflicts of interest, whether involving themselves or close relatives (spouse, civil partner, adult children or other close relatives), and will discuss any issues that may potentially conflict with the interests of Mondi with their line manager.

What do we mean by conflicts of interest?

Conflicts of interest occur when we find ourselves in a situation where two or more competing interests conflict and impair our ability to make objective, unbiased business decisions. A conflict of interest can take many forms:

- private and company interests are mixed;
- allowing private interests to influence business decisions; and
- financial or personal considerations may influence judgement when carrying out employment duties and responsibilities.

Potential conflicts of interest must be avoided or carefully managed. All conflicts or potential conflicts must be disclosed as soon as you become aware of it. It is important that such issues are dealt with promptly and in a transparent manner. You should inform your superior in the case of a potential conflict of interest and obtain his/her prior approval in writing before taking any action or business decision that could be affected by such a conflict of interest.

Examples

- i. An employee having a second job in a third party organisation which is a customer, competitor or potential business partner of Mondi.
- ii. Recruiting a close family member or close friend or such persons performing services for Mondi customers, suppliers or business partners.
- iii. Serving on the board of directors of certain organisations external to Mondi.

APPENDIX 8

MISUSE OF COMPANY ASSETS

Policy

Mondi employees and Persons associated with Mondi will protect all Mondi equipment, property and information from loss, inappropriate disclosure, loss of integrity or misuse and they will not be provided for the personal or discretionary use of customers, public officials and in dealings with the private sector.

Mondi employees and Persons associated with Mondi will not manipulate any kind of information/reporting (financial, non-financial or other management information or reporting) in any way that may mislead the end user, result in any personal advantage (real or perceived) or may inadequately represent the reality being reported. All employees and Persons associated with Mondi also have a responsibility to ensure the confidentiality of Mondi information or data.

What do we mean by use of company assets?

Corruption is not confined to the payment of cash bribes or the provision of gifts, hospitality and business courtesies. Making Mondi assets available to public officials or customers for their personal use, e.g. premises, equipment or vehicles, is likely to represent something of value for the intended recipient. Where such use is by those who may be in a position to influence Mondi's commercial dealings it can be perceived as being with the intention of obtaining an improper advantage in the conduct of that business.

Employees have a responsibility to protect Mondi assets against theft, loss, abuse, unauthorised access and disposal.

Employees may only use Mondi assets for the purpose of discharging their Mondi job responsibilities or where Mondi policy or statutory rights permit.

Information about Mondi and its operations, including intellectual property, also represent valuable assets that must be protected. While Mondi has a separate policy in place relating specifically to the maintenance of confidentiality of inside information, this Business Integrity Policy applies generally to the requirement for all employees to maintain confidentiality of key Group information. The unauthorised sharing or passing on of confidential information amounts to the misuse of company assets and will be treated accordingly.

With regard to information, this also includes producing false information or disclosures relating to financial, non-financial or management reporting. This includes manipulation of data or records or misrepresentation of any information.

Examples

- i. A Mondi employee discloses a Mondi product price list to a competitor in exchange for the competitor granting employment to a family member of the Mondi employee.
- ii. A Mondi employee manipulates the financial records, leading to disclosure of lower costs than those actually incurred, resulting in an overstated net worth position in order to improve the overall performance of the company.

APPENDIX 9

FACILITATION OF TAX EVASION

Policy

Mondi does not tolerate any form of tax evasion, including the facilitation of tax evasion. Any concern of suspected violation must be reported immediately. In addition to reporting suspected violations in accordance with this policy, you should also report such instances to Mondi's Group Head of Tax.

What do we mean by tax evasion and the facilitation of tax evasion

Tax evasion is where there is a deliberate attempt to not pay tax which is due. Tax evasion is illegal and has serious consequences, from financial penalties to criminal conviction.

The facilitation of tax evasion is where a person deliberately and dishonestly facilitates another person to evade tax. The facilitation of tax evasion by a person associated with Mondi could lead to criminal liability for Mondi, for example under the UK's Corporate Criminal Offence legislation.

Corporate Criminal Offence

The UK's Corporate Criminal Offence legislation would be relevant to Mondi in circumstances where:

1. There is criminal UK or non-UK tax evasion by an individual or company under an existing UK or non-UK law;
2. There is deliberate and dishonest facilitation of the evasion by a Mondi employee or Persons associated with Mondi; and
3. Mondi failed to prevent the Mondi employee or Persons associated with Mondi from committing the facilitation.

The law is wide reaching particularly because:

- (i) it could be applied to tax evasion in any country; and
- (ii) it could relate to a Mondi employee or Persons associated with Mondi facilitating tax evasion of other parties such as suppliers, customers, partners, advisors, shareholders, parties involved in M&A transactions, etc, providing there is intention on the part of the Mondi employee or the Persons associated with Mondi.

Examples

Examples of tax evasion include:

- i. Not reporting or under-reporting income to the tax authorities.
- ii. Engaging in accounting irregularities, such as a business's failure to keep adequate records, which lead to the underpayment of tax.

Examples of the facilitation of tax evasion include:

- i. Employees assisting a supplier in evading tax by paying cash to evade VAT.
- ii. The sales team changes or adjusts the amounts on invoices to facilitate a reduction in tax for the customer.
- iii. The human resources team acting together with an employee to allow them to be seen as self-employed and therefore evading payroll taxes.

APPENDIX 10

FAILURE TO PREVENT FRAUD

Policy

Mondi does not tolerate any form of fraud. No employee or Persons associated with Mondi shall commit or facilitate fraud (as defined below), regardless of whether the intention is to benefit Mondi, themselves or others.

What do we mean by fraud?

Fraud is defined as any dishonest act committed by one or more persons to obtain anything of value or secure any advantage, either for themselves or someone else. This can be money, goods, products or information, for instance, but it can also be an intangible gain, such as a favourable decision or keeping one's status or one's job or getting a promotion. In simple terms, fraud is intentionally acting dishonestly, or aiding someone else to, in order to benefit from such an act.

Fraud, which is a criminal offence, can include:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position
- Participation in a fraudulent business
- Obtaining services dishonestly
- Cheating the public revenue (i.e. tax authorities)
- False accounting
- False statements by company directors
- Fraudulent trading

Failure to prevent fraud

While individuals can be held liable and convicted of the offences above, under UK law, Mondi can also be held liable for failure to prevent fraud. This applies where employees or Persons associated with Mondi commit fraud with the intention of benefitting Mondi, unless Mondi can prove it had reasonable fraud prevention procedures in place. Mondi does not have to actually receive a benefit to be liable – just the intention to benefit Mondi is sufficient. The fines for a corporation found guilty are unlimited.

Examples

- i. A Mondi employee deliberately manipulates Mondi's accounts to over-state the profits with the intention of making Mondi appear more attractive to investors and securing additional investment.
- ii. A Mondi employee deliberately diverts money to projects benefitting Mondi instead of paying it into an employee's pension fund.
- iii. A Mondi employee deliberately falsifies environmental data reported to a regulator under the terms of an environmental permit, enabling Mondi to breach the terms of the permit and avoid financial penalties.
- iv. A Mondi employee or agent deliberately misleads customers about the sustainability and/or environmental footprint of our products, resulting in higher sales.

Code of Business Ethics

This Code applies to Mondi plc and its subsidiary companies (together “Mondi”). The Code sets out the five fundamental ethical principles that govern the way in which Mondi and its employees will conduct business.

The Five Mondi Principles

Legal Compliance

Mondi will comply with all applicable laws and regulations.

Honesty and Integrity

Mondi will observe the highest standards of honesty and integrity.

Human Rights

Mondi will respect internationally proclaimed human rights, and act in accordance with internationally declared standards.

Stakeholders

Mondi will have due regard to the interests of all its stakeholders including shareholders, employees, customers, business partners and communities.

Sustainability

Mondi will conduct its business sustainably, producing sustainable solutions that contribute to a circular economy, while ensuring safety, health, and the protection of the environment.

All persons performing services and/or acting on Mondi’s behalf and joint ventures where Mondi has a controlling interest are required to observe the same principles.

The detailed application of these principles is documented in Mondi’s policies and procedures, in particular the Mondi Sustainable Development Policies and the Group Business Integrity Policy.