

Code of Conduct for Suppliers



CODE OF CONDUCT FOR SUPPLIERS

I. Foreword

One of the general values guiding the acts of CMPC TISSUE S.A. ("SOFTYS" or the "Company"), a CMPC company, is respect for individuals, which is evidenced, among others, in the purpose of keeping a close relationship and a respectful treatment with all our employees and those rendering services at our operations (the "Suppliers"), from the moment they go through a selection, that shall always be founded on objective and non-discriminatory criteria, ad throughout the duration of the commercial relationship.

Likewise, SOFTYS expects Suppliers to abide by certain general guidelines that, as a supplement to the relevant contracts, must always serve as a guidance to their actions.

SOFTYS bases its operations on a strong culture of responsibility and excellence. For the Company, excellence in operation includes an honest, responsible and loyal conduct from each of its employees and from everyone rendering services and/or supplying products to our operations. It is our belief that an ethical behavior favors a relationship of trust and credibility with our relevant stakeholders.

SOFTYS maintains ongoing relationships with various stakeholders, with whom it interacts within certain territories and communicates in order to carry out its processes, products and services. [sic] It is within such a context that this Code sets forth the guidelines to direct the conduct of the Company's Suppliers.

II. Purpose

Through this Code of Conduct, hereinafter the "Code", SOFTYS sets forth the minimum standards for what it expects and demands from its Suppliers in the context of the relationship they have with the Company.

III. Scope

This Code is applicable to every Supplier of every subsidiary comprising SOFTYS, notwithstanding the relevant local regulatory requirements.

SOFTYS employees shall ensure fulfillment of this Code in the context of the relationship he/she has with Suppliers.

IV. General principles:

a. Abidance by the law

In exercise of their mandate, Suppliers shall abide by the standing regulation of the place where they perform.

b. Human Rights Observance

Suppliers shall perform their job in a work environment that respects protection of the - internationally acknowledged- fundamental rights of individuals, letting them develop their talents, knowledge and skills free from any kind of discrimination based on politics, sex, religion or race, and fostering equality of opportunities and a fair treatment at work In turn, Suppliers shall commit not to become an accomplice of any abuse to Human Rights, whether directly or because of any omission.

Suppliers shall respect employees' right to collective negotiation and to establish, without prior authorization, the trade unions they deem appropriate, the establishment and operation of which shall fully respect every regulation.

Likewise, Suppliers undertake it to ensure legal suitability in retaining for work, excluding illegal child work and every form of hard labor.

c. Health and Safety

Suppliers shall carry out a suitable training and/or orientation for their employees regarding the elements, products, and substances to be used in the production processes or at work, regarding the identification and handling of hazardous elements and products, and regarding permissible exposure limits for them, on the health risks, and on control and precautionary measures to be adopted in order to avoid such risks.

d. Environmental Care

Suppliers shall zealously look after and protect the environment wherever they render their services. They also undertake it to apply the Precautionary Principle in every situation in which they ignore the potential environmental impact of their action, in accordance with that set forth in the SOFTYS Environmental Guidelines for Suppliers.

Suppliers undertake it to prevent any sort of environmental damage, and to inform the Company forthwith in the face of such an event, whether associated to the services and/or products they offer or otherwise.

V. Honesty and Compliance

a. Corporate Honesty and Integrity

As a CMPC subsidiary, SOFTYS has a Corporate Honesty - Integrity Policy, which is part of the CMPC Honesty and Compliance Program, and is aimed at setting the minimum behavioral standards the Company expects and demands from its employees and Suppliers in order to face the potential risks of corruption to which they may be exposed when carrying out their business. To these ends, SOFTYS openly, utterly and strictly rejects and forbids every form of corruption, bribery and other conducts contrary to the principles and values of the Company.

SOFTYS's Suppliers shall carry out their operations within the context of this Code, avoiding any action or behavior that might constitute any form of corruption.

b. Free Competition

SOFTYS has a Free Competition Handbook, under which it autonomously and independently determines its commercial and strategic decisions.

The operations of SOFTYS Suppliers must all be carried out within the context of observance to free competition regulation and avoid any act or conduct that could turn out to be contrary to free competition.

c. Crime Prevention Model

SOFTYS has a Crime Prevention Model to prevent the perpetration of crimes of bribery of domestic or foreign civil servants, money laundering, financing of terrorism, and receiving stolen property. Within this context, through its Model, it has implemented a set of measures to prevent, detect and respond in order to support its operation and execution.

In this sense, Suppliers must share the commitment adopted by SOFTYS, implementing their own Crime Prevention Model, or, alternatively, to have implemented the internal control and monitoring mechanisms necessary to avoid the perpetration of any of the foregoing crimes.

d. Conflict of Interests

Acting with an interest in mind other than that of the Company, be that interest one's own or that of a third party, could seriously affect the assets, goodwill and commercial targets of SOFTYS.

In the event Supplier identifies a situation of a possible conflict of interests involving SOFTYS board members, executives and employees by and large, whether real, possible, or seeming, it shall report it to the Company before any action, and will refrain from partaking in any decision-making on matters affected by the conflict of interests or from exercising any sort of influence over the individuals in charge of making such decisions.

e. Economic sanctions

SOFTYS does business worldwide, always in strict adherence to the economic sanctions and remaining foreign trade restrictions on countries, entities, or people, applied by, among others, the United States of America, via its Office of Foreign Assets Control (OFAC) and the United Nations Organization (UN), through its Security Council. SOFTYS expects from its Suppliers the exact adherence to such restrictions, so as not to expose the Company to any such risk.

VI. Information confidentiality

Supplier undertakes it to keep in strict reserve any information provided by SOFTYS, with the same zeal it applies to keep the confidentiality of its own information, as regulated in detail in the contracts executed with the Company.

VII. Intellectual and Industrial Property Software use

Supplier shall respect the intellectual and industrial property rights of SOFTYS, agreeing to report it forthwith in the event of them being affected or there being any risk of a breach to them.

Should Supplier have access to any of SOFTYS's IT systems, it shall use them exclusively for the purposes commissioned to it, having to safeguard at all times the use of access passwords and any third-party intellectual property and industrial property rights.

VIII. Community Liaisons

SOFTYS makes a serious and proactive effort to approach, work together and have an open doors policy with the surrounding community. In that sense, in the event Supplier were to become aware of any complaints, doubts or worries of the neighboring community of SOFTYS, it shall Likewise, Supplier agrees to have a respectful attitude towards the local community.

IX. Code Compliance

This code is deemed an integral part of the contracts that SOFTYS and its Suppliers execute and, in that sense, breach to this code could result in the application of the penalties contemplated therein and in the applicable local legislation.

X. Report Lines

SOFTYS has a hotline for reports, which may be accessed via CMPC's corporate website and through its intranet "*Personas SOFTYS*" [SOFTYS People].

This channel is available both to employees and third parties. Reports may be done anonymously (provided local law so allows it), and due confidentiality shall be observed throughout the inquiry process.

Suppliers shall report through this channel every event, action, conduct, or circumstance that might constitute a breach to this Code and, in general, to applicable law.

XI. Communications

Every communication addressed to SOFTYS set forth in this Code shall adhere to the procedures set forth to such ends in the relevant contract. In the event of any doubts as to the identity of the recipient, or absence of one, the communication shall be sent to whomever holds the highest-ranking post in the SOFTYS plant where the particular services are rendered, or goods delivered.