



CODE OF ETHICS AND BUSINESS CONDUCT



MORALITY



BEHAVIOR



TRUST



RELIABILITY



RESPONSIBILITY



PRINCIPLE



RELATIONSHIP



CHOICE

September 2017



A MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER

This Code of Ethics and Business Conduct (the “Code”) was initially published in 2004. Since then, the Corporation has updated the Code when significant legislative, regulatory, or corporate policies or practices have dictated doing so. The current and authoritative version was revised not only with a view to comply with all applicable legislation, but also to preserve our enviable reputation, which constitutes an important asset and which rests on the exemplary conduct of each of us. Preserving and enhancing Cascades’ reputation requires a constant daily commitment from each employee to promote the highest principles of integrity and ethical behaviour.

With several thousand employees and close to 90 business units throughout the world, Cascades operates in a complex and rapid-paced commercial environment where we are called upon to make quick and informed decisions in a manner consistent with our values.

The Code is meant to provide you with general guidelines for acceptable behaviour in all of our relationships - with each other, our customers, our suppliers, our partners and the communities where we live and work.

It is based on Cascades’ values which have contributed to its success since 1964.

The Code does not claim to cover every situation that you may encounter in your day-to-day activities. However, when in doubt on how to act in a given situation, we urge you to discuss the matter with your supervisor or one of the appropriate resources listed herein.

We are all responsible for acting with integrity, complying with this Code and all applicable laws and policies. I encourage you to read, understand and, more importantly, to guide your actions in keeping with the Code. When you have questions, seek guidance. Thank you for joining me in this effort.

/s/ *Mario Plourde*
President and Chief Executive Officer
Cascades Inc.





TABLE OF CONTENTS

Message from the President and Chief Executive Officer

1. OVERVIEW	4
What we value	
What we are committed to	
Application of the Code	
Compliance with the Code and Certification	
Authorized Waivers	
Compliance with Local Laws and Customs	
Our Responsibilities	
2. EMPLOYEES AND THE WORKPLACE	8
Avoiding Conflicts of Interest	
Acceptance of Gifts, Invitations and other Advantages	
Health, Safety and the Environment	
Proper Use and Safeguarding of the Corporation's Assets	
Technology and Internet Practice	
Social Media	
Harassment and Violence in the Workplace	
Drug and Alcohol-Free Environment	
Human Rights	
Employee Privacy	
3. BUSINESS PRACTICES	15
Business and Financial Books and Records	
Protection of Confidential Information and Intellectual Property	
Disclosure of Information and Insider Trading	
Media Relations	
Competition and Anti-Trust Laws	
Anti-Corruption and Bribery	
Money Laundering Prevention	
Observing International Trade Controls	
Political Activities and Lobbying	
4. CORPORATE SOCIAL RESPONSIBILITY	23
Community Engagement	
Donations and Sponsorships	
5. REPORTING VIOLATIONS AND COMPLAINTS	25
Resources, Duty to Report, Internal Investigations	

In this document, "Corporation", "Company" or "Cascades" refers to Cascades Inc. and, where applicable, to one or more of its subsidiaries, divisions and joint ventures. "The Code" or "This Code" refers to this document. The Code and referenced policies are accessible on AGORA under Ethics and Compliance in the Human Resources section.



1. OVERVIEW



WHAT WE VALUE

Promoting respect, teamwork, autonomy and initiative in our work environment.

Respect

Respect is a fundamental value of Cascades and is at the heart of its philosophy. All employees must interact with respect in all their interpersonal relationships with each other, as well as in their relationships with customers, suppliers, partners and other stakeholders.

Teamwork

Employees enjoy a collegial and consultative work environment. We advocate creative and innovative thinking. In the spirit of cooperation, employees are encouraged to communicate openly and honestly with each other, sharing advice and ideas. No individual or business unit can place its own priorities before those of the Corporation.

Autonomy

In a spirit of mutual trust and within acceptable limits, each employee strives to achieve the Corporation's goals with a minimum of supervision. Managers have the freedom necessary to make this fundamental quality the engine that drives them on a daily basis. Supported, encouraged and given responsibility employees are entrusted to act in the best interest of Cascades, as if they were running their own business.

Initiative

Initiative is a key value that constantly pushes Cascades boundaries. Proactive and enterprising, employees propose, initiate and organize new ways of doing things and do not hesitate to get involved when needed. They are often in the best position to evaluate needs and let their intuition guide them towards a solution.

WHAT WE ARE COMMITTED TO

Taking into account these values and our commitment to ethics and compliance excellence in all of our business activities, Cascades' Code outlines its position and expectations regarding appropriate corporate and individual conduct expected of employees as well as those individuals working on Cascades' behalf.

The Code requires that we exercise the highest degree of ethical conduct in all of our dealings with or on behalf of Cascades. A breach of the Code could result in serious consequences for employees and Cascades. The Code does not address every situation or issue that could arise and relies upon each individual to use his or her common sense and judgment with honesty.

The Code is supplemented by not only the policies listed herein which are available on Cascades' collaboration portal **AGORA** under Ethics and Compliance in the Human Resources section but also by the Corporation's internal regulations governing employee conduct in the performance of their duties. The Code is also available on the Corporation's website at <https://www.cascades.com/en/profile/governance/code-ethics/>

Please refer to the examples provided relating to unethical behaviors on AGORA under Ethics and Compliance in the Human Resources section.



APPLICATION OF THE CODE

The Code applies at all times, without exception, to all members of the Board of Directors and all Cascades employees (regular, temporary, contractual, full-or part-time). Cascades' suppliers are expected to adhere to the principles of the Code while partners, as well as third parties (such as agents and consultants) are expected to adhere to the Code when dealing with or acting on behalf of the Company. The Code may be amended from time to time to reflect new realities or changes to the regulatory environment and best practices.

COMPLIANCE WITH THE CODE AND CERTIFICATION

Everyone to whom the Code applies must comply with the Code and actively defend its principles. Any employee who fails to comply with the provisions of the Code, established policies, standards or procedures is subject to disciplinary action up to and including dismissal. Nothing in this Code restricts the Corporation from taking any disciplinary action on any matters pertaining to employee conduct, whether or not they are expressly discussed in this Code. A consultant who fails to comply with the Code may see his or her contract terminated or not renewed. Depending upon the nature of the violation, Cascades may have the legal obligation to report the breach to appropriate authorities.

The Code will be communicated or brought to the attention of all employees. On an annual basis, all managers of the Corporation up to and including members of senior management are required to complete a certification process to ensure that the Code is understood and properly applied daily. **The certification form is available on AGORA under Ethics and Compliance in the Human Resources section and on Success Factors.**

AUTHORIZED WAIVERS TO THE CODE

The Board of Directors (the «Board») or the Corporate Governance and Nominating Committee of the Board (the «Committee») may approve any waiver of the requirements of this Code for a director or executive officer of Cascades or its subsidiaries and divisions. An executive officer of Cascades or of a subsidiary, in turn, may grant a waiver for other employees with the approval of the Office of the Corporate Secretary. A waiver will be granted only in extraordinary circumstances and on a case-by-case basis. Cascades must disclose the granting of such waiver to a director or executive officer as required by applicable securities laws.

An executive officer generally means:

- The Executive Chair of the Board
- The President and Chief Executive Officer
- A President in charge of a principal operating sector
- The Vice-President and Chief Financial Officer

COMPLIANCE WITH LOCAL LAWS AND CUSTOMS

Cascades conducts its activities on an international level and is subject to various laws and regulations. The Company's policy is to comply with applicable laws and regulations in the countries where it conducts business, namely in relation to employment and labour, nondiscrimination, health and safety in the workplace, privacy of personal information, competition, securities, transportation, immigration, language and the environment. No employee is authorized to violate any such laws or regulations. In the event the laws or customs of a locality come into conflict with the present Code or with Canadian laws, you must consult a member of the Legal department.



OUR RESPONSIBILITIES

Employees

As employees, we are expected to:

- perform our duties with fairness and integrity;
- agree to do our part to achieve Cascades' objectives to the best of our ability while making decisions consistent with the Code, and without compromise;
- have a basic understanding of the Code and review it from time to time. We should also have a detailed knowledge of the provisions that apply specifically to our respective jobs; and
- seek help or guidance from identified resources when in doubt.

If you become aware of a breach or potential breach of the Code or underlying policies, you are required to:

- act promptly and in good faith by raising it with your supervisor or one of the other resources listed herein;
- take your concern beyond your supervisor to one of the other resources listed herein if you are uncomfortable discussing the suspected breach with your supervisor; and
- be prepared to fully cooperate with internal or external investigations, when required.

Managers

Cascades' managers have additional responsibilities under the Code, namely to:

- lead by example and to promote a culture of compliance and integrity;
- be diligent in preventing, detecting and responding to any breaches to the Code;
- ensure that employees have access to the Code, either online or in paper format if required, and that they know, understand and comply with its provisions; and
- support and never allow retaliatory action against anyone who reports a concern in good faith.

QUESTION: We seem to be setting higher and higher goals every year. My colleagues and I are under pressure to get results – maybe even by doing whatever we need to do to achieve results. Is this the right way to run the business?

ANSWER: We must uphold the highest ethical standards. We do set high goals and we work hard to achieve them. However, we must not violate our ethical standards in order to meet or beat our targets.

Board of Directors, Corporate Governance and Nominating Committee and Audit and Finance Committee

It is the responsibility of the Board of Directors to take steps to ensure that senior management through the implementation of a Code and by other means are working to promote a culture of integrity throughout the Corporation. It is the responsibility of the Corporate Governance and Nominating Committee of the Board to periodically review the Code and its application within the Company. It is the responsibility of the Audit and Finance Committee of the Board to investigate questions regarding auditing and accounting reported through the ethics telephone line and secure website. In addition, the Office of the Corporate Secretary in conjunction with Internal Audit, report quarterly to the Audit and Finance Committee on the number and scope of issues brought via the ethics telephone line or the secure website, as the case may be. The Code is administered by the Corporate Secretary's Office.



2. EMPLOYEES AND THE WORKPLACE



AVOIDING CONFLICTS OF INTEREST

All employees must avoid any activity that could compromise their judgment, or objectivity and their capacity to act honestly and with integrity in the performance of their duties at Cascades. This objectivity may be compromised when employees have obligations, activities or personal and professional interests that conflict or compete with the Corporation's legitimate interests.

It is equally important that employees avoid apparent conflicts of interest, namely a situation where an observer might reasonably assume the presence of a conflict of interest, and therefore a loss of objectivity in the performance of their duties on behalf of Cascades.

Any employee who believes he or she is in a potential or apparent conflict of interest must advise his or her immediate supervisor. For additional information, contact your Human Resource representative or a member of the Legal department or the Internal Audit Department.

QUESTION: As part of my job responsibilities, I am charged with selecting suppliers. One of the suppliers being considered is a company owned by my spouse. Do I need to take any precautionary measures?

ANSWER: In this situation, your interest in your spouse's business conflicts – or at least appears to conflict – with your responsibility to select the best supplier for the Company. You should consult your supervisor or seek guidance from the identified resources listed in the Code.

ACCEPTANCE OF GIFTS, INVITATIONS AND OTHER ADVANTAGES

Employees of the Company may directly or indirectly accept gifts, invitations or other advantages resulting from activities associated with their duties and responsibilities only when these gifts, invitations and other advantages:

1. Are of nominal value and are proper in the circumstances, or are in accordance with normal gestures of courtesy or fall within current norms of hospitality;
2. Are such that their acceptance does not put in doubt the objectivity or impartiality of an employee;
3. Will not compromise the integrity of the Corporation;
4. Will not influence an employee's judgment or the performance of his or her duties and responsibilities; or
5. Are authorized by Cascades' management.

Furthermore, employees are prohibited from soliciting gifts, invitations or other advantages such as cash, goods and services, rebates, favors, loans including material or equipment on a preferential basis, trips or accommodations.

Employees are not prohibited from accepting invitations to receptions, luncheons, business dinners, sporting events or charitable functions for legitimate business purposes, or to facilitate discussions on issues of importance to the Company if these invitations remain clearly within acceptable norms and do not compromise the objectivity of employees.



Please refer to the Gifts and Entertainment Guidelines for assessing a proper course of action on AGORA under Ethics and Compliance in the Human Resources section.

QUESTION: A current supplier of the Company has offered to fly me to his time-share for a golf vacation. I have a good relationship and have worked with this supplier for years. Can I accept the offer?

ANSWER: No. the value of this gift is excessive and the relationship exists because of your position within Cascades. Employees can accept incidental gifts, customary hospitality or other benefits of nominal value.

HEALTH, SAFETY AND THE ENVIRONMENT

Cascades is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impact to the environment and the communities where it does business. Employees must comply with all applicable health and safety laws, regulations and Company standards.

It is our duty to take responsibility for our environment, our health and safety and that of our coworkers. Each employee must report to a supervisor a potentially dangerous situation for the environment or his or her health and physical well-being, as well as that of his/her co-workers.

Cascades is involved in the transformation of resources and, as such, its activities may have repercussions on the environment. Cascades' management is not insensitive to such risks and advocates the implementation of appropriate practices on the subject.

Please refer to the document entitled Planet Focus available on AGORA under Ethics and Compliance in the Human Resources section.

We are committed to being an environmental leader by meeting or surpassing applicable legal and regulatory requirements regarding the protection of the environment. We support sustainable development and we look to minimize waste generation and energy consumption in all of our activities.

PROPER USE AND SAFEGUARDING OF THE CORPORATION'S ASSETS

The responsibility to protect Cascades' assets, both tangible such as buildings, materials, equipment, supplies and other physical property, and intangible assets, such as communications networks, information systems and intellectual property against loss, theft, damage, abusive use, unauthorized use and destruction is incumbent on all employees. Every employee is responsible for safeguarding Cascades' assets and for using these assets and resources appropriately and responsibly.

Fraudulent or dishonest actions by employees with respect to the Company's assets are strictly prohibited. A few examples include, but are not limited to:

- falsification of expenses claims;
- fictitious vendor invoices and/or receipts;
- authorizing or receiving payments for goods not received or services not performed;
- misappropriation of funds, supplies or any other asset; and



- making or altering documents or computer files with the intent to defraud the Company or its customers.

For additional information, please refer to the Company's Anti-Fraud policy and reporting procedures which are available on AGORA under Ethics and Compliance in the Human Resources section.

TECHNOLOGY AND INTERNET PRACTICE

Every employee is responsible for using the Corporation's information system and computer system, including e-mail and the Internet, properly and in accordance with Company policy. Any questions about the policy should be addressed to the Corporation's Security Governance Information Group.

Computer System

The computers that employees' access for work purposes and the Company's e-mail system are the property of the Company and have been provided for use in conducting Company business. All communications and information transmitted by, received from, created or stored in its computer system or on mobiles (whether through word processing programs, e-mail, the Internet or otherwise) are the property of the Company.

Access to the Internet is provided for business purposes. However, accommodating employees' development and awareness needs through personal use of Company-provided Internet may be appropriate under certain circumstances. Personal use must be reasonable, i.e. it must not impede or reduce an employee's ability to perform his/her duties, diminish productivity or effectiveness at work or negatively impact the Company in any way. Employees are responsible for any action taken while using the Internet or e-mail and will be held accountable.

Software

Employees are prohibited from making copies of software purchased and owned by the Company in violation of copyright or trademark laws, or from using software that does not belong to the Company or for which the Company does not have a license.

Employees are prohibited from installing applications and/or utilities on the Company's computer system or on mobiles (including those downloaded from the internet) and for which the use has not been expressly authorized by the Company.

For more information on the subject, please consult the Technology and Internet Practice available on AGORA under Ethics and Compliance in the Human Resources section.

Except as limited by applicable laws, Cascades reserves the right to monitor equipment, systems, and network activities, including but not limited to email, voice mail, Internet usage and any stored information, in appropriate circumstances and pursuant to applicable laws.

QUESTION: I often work in the office after regular hours. I sometimes listen to music or watch movies online on my company computer or my company mobile. I figure I am not disturbing anyone since I do it after operating hours. Am I right?

ANSWER: No. It is never acceptable to use networks provided by Cascades to download or stream media for personal entertainment. Doing so will affect performance and availability of Cascades'



networks and would increase corporate mobile costs. Internet access at work should be infrequent, brief and in no way, interfere with your job performance.

PAYMENT CARD INDUSTRY (PCI) COMPLIANCY

Since July 2016, Cascades accepts credit cards as a method of payment in several plants and in shared services call center. This new method of payment requires Cascades to adhere to the Payment Card Industry – Data Security Standard (PCI-DSS) and must be certified annually. PCI requirement 12.6.2 requires that all employees acknowledge annually that they have read and understood the security policy concerning credit card protection.

To protect cardholder data from theft and fraud and to minimize the scope of PCI-DSS («Payment Card Industry-Data Security Standard»), credit card numbers of Cascades customers must not under any circumstances be stored, copied, transmitted, processed or treated on Cascades' equipment and network including messaging services (emails, IM, Skype, etc.). Only authorised equipment provided by credit card acquirer such as point of sales terminals (POS) and credit cards PIN pads can be used to perform credit card transactions.

SOCIAL MEDIA

Cascades recognizes that Social Networking (such as Facebook, Twitter, LinkedIn, online group discussions, text messaging, message boards, chat rooms, etc.) are fundamentally changing the way we communicate, offering new ways to engage with colleagues, customers, suppliers and other stakeholders. While this creates new opportunities for communication and business development, it also creates new responsibilities for employees. The Company respects the right of every employee to post a comment on social networking sites. However, Cascades is also committed to ensuring that the use of such communications serves the needs of our business by maintaining Cascades' identity, integrity, and reputation in a manner consistent with our values and established policies.

To minimize business and legal risks, to avoid loss of productivity and distraction from employees' job performance and to ensure that the Corporation's IT resources and communications systems are used only for appropriate business purposes, Cascades expects its employees to adhere to certain guidelines and rules regarding use of social media.

Please refer to the Social Media Policy and Guidelines for Employees' Responsible Use of Social Media available on AGORA under Ethics and Compliance in the Human Resources section.

QUESTION: While surfing the web, I came across a forum where people were discussing Cascades' products. I saw questions, praise and some criticism of Cascades. What should I do?

ANSWER: Unless you are a specifically authorized Cascades spokesperson in this forum, we encourage you not to participate in discussions about Cascades on the internet. You may open yourself and the Company to unacceptable risk as you may inadvertently disclose confidential information about Cascades. If you do participate in such discussions in a personal capacity, you may not discuss confidential information about Cascades or make any untrue or unsubstantiated claims about Cascades.



HARASSMENT AND VIOLENCE IN THE WORKPLACE

Cascades does not tolerate sexual or psychological harassment or any form of harassment in the workplace. Sexual harassment may include sexual advances, innuendoes or offensive propositions or any other form of sexual jokes or behaviour with a sexual connotation likely to attack a person's dignity or physical or psychological well-being. The Company does not tolerate, for example: threats, intimidation, bullying or unwarranted exclusion as well as violence of any kind. You must report any such behaviour to your Human Resources representative.

For additional information, please refer to Policy on Harassment in the Workplace available on AGORA under Ethics and Compliance in the Human Resources section.

DRUG AND ALCOHOL- FREE ENVIRONMENT

The Company is committed to maintaining a drug and alcohol-free workplace. Drinking alcoholic beverages is prohibited on the premises of the Company during working hours, except at specified Company sanctioned events. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited in all circumstances. As well, employees are prohibited from reporting to work while under the influence of alcohol or any illegal drugs or controlled substances.

Please request a copy of the Policy on Use of Drugs and Alcohol in the Workplace from your local Human Resources representative.

HUMAN RIGHTS AND THE WORKPLACE

Cascades undertakes to respect human rights and subscribes to equality in employment matters. The Company does not tolerate discrimination on the basis of race, gender, ethnic origin, religious belief or sexual orientation, or on any other characteristic protected by law. The use of inappropriate language in the workplace including swearing, vulgarity or verbal abuse is unacceptable. As well, the posting of photographs or any other printed material of a discriminatory nature in the workplace is unacceptable.

EMPLOYEE PRIVACY

It is the Company's policy to protect the personal information of its employees and to collect such information only for purposes relevant to the Company's business. Upon request, employees have the right to have access to their personal information. "Personal information" means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee. Employees' personal information refers to those records such as the employee's file and other documents collected and used to provide services or support like pay or benefits information.

All personal information must be protected by safeguards appropriate to the level of sensitivity of the information and may only be used for the identified purposes for which it was collected. Disclosure of an employee's personal information without his/her consent is limited to those within the Company who require it for identified purposes or whose duties require it, or to third parties only in circumstances where required by law. All employees - both supervisors and nonsupervisors - holding personal employee information must handle it in compliance with the privacy principles. Aside from applying appropriate safeguards (i.e.: locked drawers and filing cabinets use of passwords and encryption), employees should beware of public spaces when discussing personal employee information.



Cascades



Please refer to Management Practices for the Protection of Employees Personal Information which is available on AGORA under Ethics and Compliance in the Human Resources section.

QUESTION: My next-door neighbor is a good friend of the family of one of my colleagues. He asked me how he is doing. I explain that he is away from the office on stress leave. Should I have discussed my colleague's status with a close family friend?

ANSWER: No, it is not appropriate for you to discuss the status of your colleague even though you know your neighbor is a close family friend. As a general rule, it is inappropriate to disclose personal information of our employees for non-work related purposes. Of particular concern is sensitive personal information such as health or financial information and information about disciplinary action.



3. BUSINESS PRACTICES



BUSINESS AND FINANCIAL BOOKS AND RECORDS

Shareholders, directors, management and other interested parties must have complete and accurate financial information in order to make informed decisions. As well, Cascades is required under various securities laws and tax laws in Canada and in other jurisdictions where it operates to keep books, records and accounts that accurately reflect all transactions and to provide an adequate system of internal accounting and controls. Many employees at different levels participate in accounting processes that may directly impact the integrity of financial statements and reports on operations. They must ensure that transactions are recorded in the Corporation's accounts accurately and they must immediately report any known inaccuracies or suspicious transactions to their supervisor or one of the other resources listed herein.

In preparing and maintaining our business and financial books and records, **we must:**

- Adhere to all accepted accounting standards and practices, rules, regulations and controls;
- Always record and classify transactions in the proper accounting period and in the appropriate account and department. Revenue and expenses should be properly recognized on a timely basis;
- Ensure that estimates and accruals are supported by appropriate documentation and based on our best judgment;
- Ensure that all transactions are conducted at the level of authority provided by our policies and procedures and in compliance with applicable laws, rules, standards and regulations;
- Comply with applicable tax laws and regulations and collaborate with representatives of the appropriate authorities, as well as with the internal and independent auditors;
- Maintain books and records that accurately and correctly reflect the Corporation's commercial operations;
- Be diligent in preventing fraud and dishonesty and immediately advise our supervisor, management or the internal audit department of any malversation; and
- Make available the books and records of the Corporation for auditing purposes at all times by management, the internal audit department and the independent auditor.

In addition, those who are responsible for or involved in Cascades' filings with the *Autorité des marchés financiers*, Canadian Securities Administrators or with the United States Securities and Exchange Commission and other filings required by applicable law or other communications with the business or financial community should ensure that those filings and communications contain disclosure that is full, fair, accurate, timely and understandable.

The use of the Corporation's funds or other assets for any unlawful or improper purpose is strictly prohibited, as are false or misleading entries and unrecorded bank accounts created for any purpose.

QUESTION : I am facing various budget limitations at the end of the fiscal year. To defer recognizing an expense, I asked a supplier to bill our Company a few days late for the purchase of a costly piece of equipment. This way, I can record the purchase in the next fiscal year. The supplier will be paid and I will meet my budget. Can I do this?



ANSWER : No. You must never delay or intentionally record incorrect, incomplete or misleading information about transactions.

PROTECTION OF CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Without regard to how it is received, it is imperative that we protect the privacy of the confidential information we hold. Cascades operates in very competitive markets and confidential information must be safeguarded in the same way that all other important assets are protected. Confidential information includes information that is proprietary, technical, commercial and financial such as strategic objectives, any unpublished financial or pricing information, compensation, manufacturing processes, manufacturing costs, research and development of new products, divestitures, mergers and acquisitions, employees, customer, supplier and vendor lists and information regarding customer requirements, preferences, business habits and plans. Confidential information must be held in the strictest confidence, and reasonable prudence and care must be exercised in dealing with such information to avoid inadvertent disclosure. This information must not be used by employees in any way other than as required to perform their duties. All files, records and reports acquired or created by employees in the performance of their duties are the Corporation's property.

Intellectual property includes trademarks, trade secrets, patents, know-how and copyrights. Intellectual property rights are a valuable asset that could benefit a competitor if known. Care must therefore be taken to protect confidentiality while respecting the same rights of others in this field.

Any invention, discovery, improvement or innovation (including innovations in information technology) that an employee might design, make or accomplish during or after working hours, alone or jointly with others during the course of their employment, and which has, in any manner whatsoever, any kind of relation to or link with the Corporation's commercial activities or with any product, method, model, plan, procedure or apparatus used by the Corporation, or any invention, discovery, improvement or innovation made that might result from research or experimental work or have a relationship to it conducted by an employee, alone or jointly with others, must, at all times and for all intents, be considered as the Corporation's property and employees renounce all rights, including moral rights resulting therefrom.

QUESTION: I have become aware that an employee is disclosing third party (competitors, suppliers, customers) confidential information to other Cascades employees. What should I do?

ANSWER: You must report this immediately to your supervisor or through the ethics telephone line at 1-877-938-3917 in North America or through the secure website at <https://www.clearviewconnects.com/Home.htm>. Cascades' reputation could be significantly harmed by such disclosure, and this could expose the Company to potential legal action. Taking immediate steps to contain the confidential information is critical.

DISCLOSURE OF INFORMATION AND INSIDER TRADING

Securities laws impose obligations on individuals in possession of material information of a public company that has not been disclosed to the public. "Undisclosed material information" is information that is not known to the public and that is significant enough that, if publicly known may affect the market price of Cascades' shares. For example:

1. Unpublished financial results, namely annual and quarterly results
2. Major acquisitions or divestitures



3. Important contracts that are entered into or terminated
4. Significant changes in Cascades' products
5. Increases or decreases in regular dividends paid to shareholders
6. Significant investment projects
7. Take-over bids or other change of control situations

Penalties for breaching these laws are severe.

The directors and management of Cascades as well as any employee or other person who has knowledge of material information relating to Cascades or another public company must:

1. Refrain from trading in securities of Cascades or of the public company to which the material information relates until such information has been publicly disclosed;

Note: Any person involved in the negotiation of a transaction with a public company, whether this company is a subsidiary or not of Cascades, becomes an insider of this public company. Consequently, this person must not trade in the securities of the said company until the transaction has been finalized and disclosed.

2. Refrain from disclosing to anyone material information other than in the performance of their duties and only where necessary, while protecting the confidentiality of the information disclosed.

In addition to the above-mentioned restrictions, the directors and management of Cascades and its subsidiaries must refrain from trading in Cascades securities during the period between the seventh (7th) day before the end of a quarter and twenty-four (24) hours after the date of disclosure of the quarterly or annual results, as the case may be.

When in doubt as to the nature of the information held and before trading in the securities of the Company, consult the Policy on Insider Trading and Privileged Information which is accessible on AGORA under Ethics and Compliance in the Human Resources section and seek advice from the Corporate Secretary's office or a member of the Legal department.

It is to be noted that spouses and dependants are subject to the same restrictions mentioned above.

You can only purchase shares once the information has been publicly disclosed by the Company. The purchase of shares based on insider information is subject to disciplinary action and even criminal proceedings.

QUESTION: I am part of the team involved in the preparation of the quarterly financial results. I therefore I have access to the draft package of the results before they are approved for release. One evening, my neighbour enquires, "How is Cascades doing these days?" In this casual conversation, is it acceptable if I respond, "Well, I can tell you one thing: the results are very good this quarter."

ANSWER: No. It is not acceptable. This information is not yet public and it is therefore regarded as confidential proprietary company information that is material (i.e. would reasonably be expected to



have a significant effect on the value or price of Cascades' shares), you would be engaging in "tipping" in violation of securities laws.

MEDIA AND INVESTOR RELATIONS

As a listed company on a stock exchange, Cascades is obligated to comply with timely disclosure rules in accordance with securities legislation and the rules of the Toronto Stock Exchange (TSX). The principal objective is to ensure timely disclosure of material information on the Corporation. In order that a consistent message is delivered, it is necessary to limit the number of individuals who are authorized to communicate information to the media or the financial community on behalf of the Company. No employee should speak publicly on the Company's behalf unless authorized to do so. Cascades authorized spokespersons are the Director, Investor Relations and the VicePresident, Communications and Public Affairs. It is the responsibility of Cascades' authorized spokespersons to interact with the media and to ensure timely communication of reliable and pertinent information. Any person dealing with the media must demonstrate integrity, while refraining from unauthorized disclosure of proprietary or non-public information.

Please refer to the Policy on Disclosure of Information, which is available on AGORA under Ethics and Compliance in the Human Resources section.

COMPETITION AND ANTI-TRUST LAWS

The purpose of The Competition Act (Canada) (the "Act") is to maintain and encourage competition in order to promote the efficiency of the Canadian economy, to ensure that small and medium-sized enterprises have an equitable opportunity to participate in the Canadian economy and to provide consumers with competitive prices and product choices. The other countries where Cascades operates have similar laws.

The Company has implemented a Policy on Competition and Anti-Trust Laws and other competitive tools in order to inform its employees of the principal provisions of competition legislation. Please refer to the documentation provided on Agora under Ethics and Compliance in the Human Resources section.

The guidelines of the "Policy on competition" read as follows:

1. Relations with competitors: as a general rule, among competitors, the Act forbids contracts, combinations, conspiracies, agreements and other arrangements which have the effect of limiting or harming competition. You must avoid any discussion or agreement with competitors on the following subjects:
 - Prices and price-related subjects, such as rebates, discounts, payment terms or shipment terms. You must also avoid any discussion on subjects related to costs, production levels, inventory levels and the like.
 - Division by customer or market share
 - The refusal to sell to targeted customers (boycott agreement)
 - Any other activity the objective of which is to limit or harm competition.



Employees have the right to obtain information about the industry in which the Company operates. This includes information about its competitors, their products, services, technologies, prices and so on. However, this information must be gathered by legal and ethical means. Acting otherwise, may result in allegations of anticompetitive behaviour, and possibly in legal proceedings.

2. Trade associations: Participation in trade associations is an activity that is perfectly legitimate insofar as the association is not used for the purpose of limiting or harming competition. However, while participating, avoid all meetings or discussions with competitors on the subjects mentioned above. In the event these subjects are raised during a meeting you are attending, change the subject or leave the meeting.
3. Relations with customers: The Act contains several provisions that deal with customer relations. As a general rule, these provisions are meant to ensure that customers are treated in a fair and equitable manner, regardless of their size. These provisions deal namely with the following subjects:
 - Price maintenance: Any agreement or arrangement that relates to the price the customer resells the products purchased from the Company is illegal.
 - Tied selling: Demand that the customer purchase a product he does not want in order to purchase a product he does want is an illegal practice.
 - Refusal to sell: Refusing to sell to a customer may be considered illegal if the refusal is attributable to anticompetitive reasons. As in the case of price discrimination, there are a multitude of motives that may justify a refusal to sell. When in doubt, you must contact the Legal department.
4. Misleading representations and deceptive marketing practices: The Act regulates in a number of respects how businesses may conduct their advertising and marketing programs. The Act contains provisions addressing false or misleading representations and deceptive marketing practices in promoting the supply or use of a product or any business interest.

Both in principle and practice, all advertising claims and representations must be supportable. If the support on which an advertised claim or representation is a test or survey data, such data must be reasonably competent, reliable and documented.

Testimonials, endorsements or representations of opinion or preference, must reflect the genuine, reasonably current opinion of the individual(s), group or organization making such representations, and must be based upon adequate information about or experience with the product being advertised, and must not otherwise be deceptive.

Any person in the Company's employ who has knowledge of activities with anticompetitive/antitrust implications must immediately advise Cascades' Legal department.

No employees shall suffer any adverse employment consequences for reporting in good faith a possible contravention to competition and anti-trust laws.

QUESTION: Our business unit recently hired someone who was employed by a competitor. This person has confidential information which would be very valuable to us. Can we ask him to disclose this confidential information?



ANSWER: Absolutely not. The new employee has an obligation to protect his/her former employer's confidential or proprietary information, just as you would be obliged to protect Cascades' confidential or proprietary information if you were to leave Cascades. You must respect the employee's personal integrity as well as his/her obligation to his/her former employer. Inducing an employee to disclose such confidential information is a violation of the Code.

ANTI-BRIBERY AND ANTI-CORRUPTION

Cascades complies with anti-bribery and anti-corruption legislation in all jurisdictions where it operates. This legislation includes the *Corruption of Foreign Public Officials Act* of Canada and the *Foreign Corrupt Practices Act* of the United States. This legislation prohibits Cascades, its employees and its agents, from directly or indirectly through an intermediary, offering, promising to pay or authorizing the payment of money or anything of value to foreign government officials, parties or candidates for the purpose of influencing the acts or decisions of foreign officials. Accordingly, Cascades must never make, directly or indirectly, a payment in money, property or services to a foreign official for the purpose of obtaining favorable treatment in negotiations or to obtain or retain business for the Company.

Please refer to Cascades' Anti-Bribery and Anti-Corruption Policy, which is available on AGORA under Ethics and Compliance in the Human Resources section.

Cascades requires that all of its employees, officers, directors, agents, brokers, consultants and other individuals and firms representing it, as well as its suppliers and business partners, including those located outside of Canada and the United States, comply with all applicable anti-bribery and anti-corruption laws. Taken together, these laws prohibit both public and commercial bribery, and violations can lead to severe fines for the Company and individual offenders as well as imprisonment for individuals.

Please refer to Cascades' Anti-Corruption Red Flags document, which is available on AGORA under Ethics and Compliance in the Human Resources section.

QUESTION: A vendor has asked me to send his payment through a wire transfer to the Cayman Islands to the attention of a company that has no apparent relationship with the vendor. We have a longstanding relationship with this vendor and have always sent our payments to his company at his principal place of business. Should I be suspicious?

ANSWER: Yes, you should be suspicious because the vendor is requesting you to transfer funds to a country that is unrelated to the vendor and to an entity unrelated to the transaction. This transaction may be used to disguise financing for criminal activity or other illegal activity. Consult with your supervisor, the Legal department or the Internal Audit Department who will review the situation.

If in doubt on whether a payment may constitute a bribe or a facilitation payment, or on whether any agent, broker, consultant or any other individual or firm representing Cascades, or any supplier or business partner may be involved in bribery or corruption activities, consult a member of the Legal department.

MONEY LAUNDERING PREVENTION

Many countries have adopted legislation that makes it illegal to accept or process the proceeds of crime. The Company is committed to complying fully with all applicable anti-money laundering laws



in the jurisdictions where it operates. Because it values its integrity and reputation, Cascades is also committed to doing business only with business organizations that are involved in legitimate business activities, with funds derived from legitimate sources, and it takes steps to ensure that it only takes and makes acceptable forms of payment that are not a means to launder money.

If in doubt on whether any customer, agent, broker, consultant or other individual or firm representing Cascades or any supplier or business partner may be involved in money laundering activities, consult the Legal department.

Please refer to Cascades' Anti-Corruption Red Flags document, which is available on AGORA under Ethics and Compliance in the Human Resources section.

OBSERVING INTERNATIONAL TRADE CONTROLS

Many countries have adopted legislation that restricts the Corporation's ability to do business in certain countries or with certain individuals or firms (such as terrorists) or, conversely, prohibit restrictive trade practices or boycotts imposed by other countries. Those laws apply to the sale of our products, to our purchases and to our treasury activities. They may also cover the exchange of certain types of information (such as technical drawings, emails or web access) across borders.

Cascades is committed to complying fully with all applicable international trade control legislation, including export control laws, anti-terrorist laws and anti-boycott laws, where we conduct business.

Please refer to the Guidelines on observing International Trade Controls, which is available on AGORA under Ethics and Compliance in the Human Resources section.

If in doubt on whether an international trade control is applicable, consult a member of the Legal department.

POLITICAL ACTIVITIES AND LOBBYING

Employees are free to participate in the political process as candidates, campaign directors, and heads of fundraising activities or volunteers. They must, however, ensure that their involvement is set apart from their responsibilities as employees of the Company. They must also ensure that any declaration made as a private citizen in the course of their political activities is strictly personal and cannot be interpreted as representing the opinion of the Company. They cannot promote parties or political programs on Company premises and the use of Company property such as photocopiers, emails, posters, or other for political purposes is prohibited.

As a corporate citizen, Cascades often takes a position on issues of public policy that could impact our business. The Company also engages in efforts to affect legislation or government policy. However, regulations on activities in this area vary according to jurisdictions. Therefore, only certain individuals within the Company may engage in lobbying efforts on Cascades' behalf.

Do not contact a public office holder in an attempt to influence a decision concerning the development, introduction, amendment or defeat of any legislative or regulatory proposal, resolution, policy, program or action plan or the issue of any permit, certificate, license or other authorization as well as, the awarding of any contract other than by way of a call for public tenders on behalf of Cascades unless you coordinate your efforts with and receive approval by the Corporation's Vice-President, Communications and Public Affairs.



4. CORRPORATE SOCIAL RESPONSIBILITY



COMMUNITY ENGAGEMENT

The Company recognizes that it has a social responsibility and has always sought to contribute to the quality of life in the communities where it is active and where its employees reside. The Company encourages investment in volunteer work on an individual basis and promotes community life.

For Cascades, social responsibility implies paying close attention to the actions that affect its employees and society. Cascades has established a number of strategies to improve and maintain healthy working relationships and conditions for its employees. It also works with neighboring communities to promote respectful dialogue while supporting local development.

DONATIONS AND SPONSORSHIPS

Cascades fulfills its role as a responsible citizen by supporting environmental and social causes. Since it was founded, the Corporation has encouraged the human and economic development of the communities in which it operates by investing significant sums of money. Thus, year after year, Cascades has used donations and sponsorships to support different products and events that are related to its preferred sectors.



5. REPORTING VIOLATIONS AND COMPLAINTS



RESOURCES, DUTY TO REPORT AND INTERNAL INVESTIGATIONS

The Code covers Cascades' fundamental principles governing ethical business conduct. It also deals with the responsibilities for overseeing and reporting violations. All employees are required to report any potential violations, suspicions or concerns to one or more of the appropriate resources identified below or through the third-party confidential ethics telephone line at 1-877-938-3917 in North America or through the secure website at <https://www.clearviewconnects.com/Home.htm>.

1. Your supervisor
2. Your Human Resources representative
3. A member of the Legal department
4. A member of senior management
5. The ethics telephone line or secure website made available by the Company.

All inquiries will be handled promptly and confidentially and every effort will be made to maintain confidentiality unless disclosure is unavoidable in order to conduct an effective investigation, take appropriate action or support legal proceedings.

No retaliatory action will be taken against any employee for reporting in good faith a violation to the Code or participating or assisting in the investigation of a suspected violation of the Code, unless the allegation made or information provided is found to be intentionally false. Deliberately or recklessly making false complaints could result in disciplinary action.

QUESTION: I suspect that my supervisor is engaging in behaviors which could be considered a violation to the Code. However, I am afraid that if I report the situation and my supervisor finds out, he could hold it against me.

ANSWER: As a Cascades employee, if you know or have good reason to suspect a violation of the Code, you are required to report that information through the ethics telephone line or secure website. As long as a suspected violation is reported in good faith following the procedures outlined in the Code, our non-retaliation policy prohibits any adverse action being taken against you for that report. Any Cascades employee who knowingly retaliates because a suspected violation has been reported is subject to disciplinary action.

QUESTION: What if someone makes a report against me and I haven't done anything wrong?

ANSWER: Please be assured that the Company does not assume that a violation has occurred just because a report has been made. Instead, the Company assigns one or more parties from outside your business unit to thoroughly investigate the suspected violation. The Company will presume you are innocent during the course of the investigation and will not make a final determination regarding culpability until after the factual findings of the investigation have been reviewed and it is determined that they support the allegation. You will also be given an opportunity during the course of the investigation to present your side of the story.