

THE MANAGEMENT BOARD'S POSITION ON THE QUALIFIED OPINION FORMULATED BY THE STATUTORY AUDITOR IN THE REPORT ON THE AUDIT

Report of the independent statutory auditor of the audit company KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp.k. from the audit of the annual consolidated financial statements of the Arctic Paper S.A. Capital Group for the financial year from 1 January to 31 December 2020 contained a qualified opinion as follows:

“The consolidated financial statements in the ESEF format as at 31 December 2020 and for the year then ended do not contain the complete calculation link bases of extension taxonomy to document arithmetical relationships between numeric core or extension taxonomy elements. In our opinion, in accordance with point 6 of annex IV to the Commission Delegated Regulation (EU) of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format, the Management Board of the Parent Entity should ensure the completeness of the calculation link bases of extension taxonomy to document arithmetic relationships between core or extension taxonomy elements from the statement of financial position, statement of profit or loss, statement of comprehensive income, statement of changes in equity and statement of cash flows.

Our opinion has been formed on the basis of, and is subject to, the matters outlined above. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on assurance engagement.

In our opinion, except for the effect of the matter described in the “Basis for Qualified Opinion” section, the consolidated financial statements in the ESEF format as at 31 December 2020 and for the year then ended was prepared, in all material respects, in accordance with the requirements of the ESEF RTS”.

In the opinion of the Management Board of the Company, the qualified opinion formulated by the statutory auditor does not affect the financial result and the economic and financial position of the Group in the financial statements and in its essence refers only to the technical standards of the systems validating financial statements prepared in the Xhtml format, tagged using the XBRL markup language. Thus, the reservation concerns only the sphere of the report format, not its substantive content.

At the same time, the Management Board of the Company informs that the results of the validation of the consolidated financial statements in the ESEF format, which were sent to the Polish Financial Supervision Authority via the ESPI system in accordance with the regulations, did not reveal any errors in the submitted report.

The Management Board of the Company presented the above explanation to the Supervisory Board of the Company, which in the adopted resolution shared the position of the Management Board.

Podpis jest prawidłowy

Dokument podpisany przez
Michał Jarczyński
Data: 2021.03.19 09:37:07
CET



Signed by /
Podpisano przez:

Bo Göran Eklund
ARCTIC PAPER
S.A.

Date / Data: 2021-
03-19 09:16