

Third Party Code of Conduct



Overview

Our Values. International Paper Company and its subsidiaries (“International Paper”) are committed to doing business with integrity, treating all people with dignity and respect, supporting our communities and honoring the laws that govern our operations. We value all third-party providers whose goods and services enable us to make products people depend on every day, and we hold our providers to the same ethical standards to which we hold ourselves.

Our Expectations. This Third Party Code of Conduct (“Third Party Code,” “Code”) outlines our expectations for the workplace standards and business practices of our suppliers, contractors, consultants, agents, representatives, brokers, distributors, intermediaries and other third parties who provide us with goods and services, along with their parent entities, subsidiaries, subcontractors and supply chains (together, “third parties”). These principles decide whether we form or extend business relationships. If a third party has its own code of conduct with these principles, we may accept its commitment to comply with its own code and consider it in compliance with this one. Third parties are responsible for ensuring their employees, representatives, agents and subcontractors understand and comply with these principles.

The Purpose of this Code. These expectations do not replace or alter contract requirements, but may supplement them. If a contractual term is stricter than this Code, a third party must meet the stricter requirement.

A Global Reach. International Paper honors the laws and standards in our countries of operation, including the U.S. Foreign Corrupt Practices Act, the EU’s General Data Protection Regulation, the UK Bribery Act, and those that control international trade across borders. When we say “the law” or “laws” in this Code, we mean those that apply to our own and our third parties’ business. We expect third parties to comply with laws of their countries, but to refrain from corruption and bribery even if local law or custom allows them. Where local law does not conflict with or address these principles, we expect them to follow this Code.

Health, Safety and the Environment

Workplace Health and Safety. We expect third parties to promote safe and healthy work sites. They should provide everything needed to reduce the risk of accidents, injuries and exposure, especially where there are hazardous materials. They must have well-established safety rules, preventative maintenance and protective equipment in compliance with the law.

Responsibility to the Earth. Third parties must comply with environmental laws, including those on hazardous materials, wastewater, solid waste and air emissions. We encourage third parties to reduce their impact on the environment and climate and to protect natural resources we all depend on, especially through reasonable efforts to reduce or eliminate waste of all types, including

through source reduction, recycling, composting and conserving water and energy.

Workplace, Labor and Human Rights

Respect and Dignity. Third parties must keep workplaces free of harassment, sexual harassment, harsh treatment, intimidation, violence, corporal punishment, mental or physical coercion, verbal abuse and discrimination.

Wages and Benefits. Third parties must obey laws on compensation, work hours and benefits.

Freedom of Association. Third parties must respect their employees’ right to join or not join any lawful association without fear of retaliation.

Employment Eligibility and Voluntary Labor.

International Paper honors labor laws. We do not tolerate prohibited child labor, forced labor or any form of coercion, physical punishment or abuse of workers. We expect the same of third parties. Third parties should only hire workers with a legal right to work, and they are responsible for verifying and documenting their work eligibility. Neither they nor their contractors should use misleading recruiting practices, hold workers’ identification documents, deny them access to such documents, charge fees for jobs or provide housing below the host country’s housing and safety standards.

Human Rights. Third Parties must follow laws on human rights, human trafficking and slavery. Where applicable, they must also follow standards on procuring certain minerals from areas marked by armed conflict, widespread violence or other factors linked with human rights violations.

Business Conduct and Ethics

Illegal Payments, Corruption and Bribery. Third parties must refrain from all corruption. They must not agree to offer or accept gifts, entertainment or favors that are intended, or may appear intended, to obligate or inappropriately benefit either party. They must not commit embezzlement, fraud, extortion, bribery or kickbacks. A third party must use every effort to know when it is dealing with a government official or anyone connected to a government official or entity. It must ensure any payment or promise of payment to them has a legitimate business purpose and complies with the law, this Code and, where applicable, other codes of conduct. Third parties must also follow tax laws and not participate, individually or by supporting others, in any form of fraud or evasion of tax and social security contributions.

General Contracting and Fiscal Integrity. When providing goods and services, third parties must meet contractual obligations. They must not do anything illegal on property that International Paper owns or leases. Representations to us must be accurate and truthful. They must not reference International Paper's name or logo in any form of media messaging or advertisement without our advance permission. They must keep accurate records and adequate business controls.

Conflicts of Interest. Where permitted, third parties must disclose to their International Paper business contact any known conflict of interest, such as when one of their employees, or an employee's family member or close friend, has a relationship with an International Paper employee who can make decisions that affect the third party's business, or when an International Paper employee has any interest in the third party.

Securities and Insider Trading. Third parties who learn of any material non-public information while doing business with or for International Paper must not share it with others or use it for market trading.

Antitrust and Competition Laws. Third parties must avoid agreements or actions that evade competition laws. They may not offer our employees any confidential information about an International Paper competitor.

Gift-Giving and Political Contributions. Bribes to our employees are forbidden regardless of local custom, along with any gift, entertainment or other favor that is inappropriate or whose value exceeds legally defined limits. Furthermore, third parties must not offer such gifts or favors to government officials – or make direct or indirect political contributions – on behalf of International Paper.

Intellectual Property and Data Privacy. Third parties may not disclose or use any of International Paper's intellectual property rights, trade secrets or confidential information unless we specifically authorized it. They must comply with intellectual property and data privacy laws and take reasonable precautions to protect personal data acquired while doing business with us – for example, from unauthorized access, destruction, changes, misuse and disclosure.

Grievance Process. To the extent appropriate to their size, third parties should have a reasonable grievance process for their employees to raise good-faith concerns about violations of this Code – or their own code, if acceptable – and of law, without fear of retaliation.

Accountability and Compliance

In accordance with the law, International Paper will hold third parties accountable for compliance with this Code or their own code, if acceptable to us. Third parties must notify their employees and supply chains of these expectations. We reserve the right to investigate any instance of a third party's non-compliance with this Code, its own code or the law. Non-compliance may be grounds to void or terminate our contractual obligations depending on circumstances and the law.

Reporting Resource

International Paper receives good-faith reports about potential violations of this Code, our company code of conduct, policies or law, and we do not permit retaliation for such reports in accordance with applicable laws. We expect our third parties to encourage reports through their own grievance processes or, where local law allows, to International Paper. Make reports to International Paper's Global Ethics and Compliance office at ethics@ipaper.com or the International Paper HelpLine at 1-800-443-6308 (North America) or 1-877-319-0263 (via AT&T USADirect outside North America).