

EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION STATEMENT

International Paper is committed to providing a workplace free of discrimination, harassment and retaliation. There will be no discrimination or any type of harassment against any IP job applicant or employee because of race, ethnicity, color, religion, sex, sexual orientation, marital status, age, disability, gender identity or expression, genetic information, national origin, military or veteran status, or any other classification protected by law. All actions relating to any aspect of employment and employment decisions – such as recruitment and hiring, training and development, rates of pay or other forms of compensation, transfer, demotion, and promotion, layoffs and recalls, discipline and discharge – will be free of any such discrimination or retaliation.

International Paper is a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veteran's Readjustment Act of 1974, as amended ("VEVRAA") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). It is the company's policy to promote the employment and advancement of minorities, women, persons with disabilities and protected veterans in all phases of the employment process and in compliance with applicable federal, state, and local laws and regulations. International Paper also maintains affirmative action programs to implement its equal employment opportunity commitment. Applicants or employees who wish to review appropriate portions of these programs may schedule an appointment to do so by contacting the company's Compliance Officer (901-419-7249).

International Paper will make reasonable accommodations for the known disabilities of otherwise qualified applicants for employment as well as its employees, unless undue hardship would result. Any applicant who requires an accommodation in order to apply for a job or perform the essential functions of a job should make that request known to the company by contacting the company's Compliance Officer (901-419-7249). Employees should contact their local Human Resources manager to request an accommodation. International Paper will engage in an interactive process with the applicant or employee to determine if an accommodation can be provided.

International Paper will not tolerate any form of harassment, intimidation, discrimination, or retaliation of applicants or employees because they have engaged in good faith in any of the following activities:

- Filing a complaint alleging discrimination, harassment or failure to accommodate
- Participating or assisting in an investigation or compliance review related to, Executive Order 11246, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation
- Opposing any act made unlawful by Executive Order 11246, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation
- Requesting an accommodation due to disability

Employees or applicants that believe they have been discriminated against in any manner as described above, should notify the International Paper HelpLine at (1-800-443-6308). The

company shall direct management personnel to take such action as may be required to prevent behavior prohibited by this policy. All matters will be investigated and appropriate disciplinary action will be taken, up to and including termination of employment, if necessary. Retaliation against anyone who complains of or witnesses behavior contrary to this policy is also prohibited.

POLICY AGAINST HARASSMENT

Freedom from discrimination includes freedom from any form of harassment or bullying due to a person's race, ethnicity, color, religion, sex (whether or not sexual in nature), sexual orientation, gender identity or expression, marital status, military or veteran status, or any other classification protected by law. This conduct is prohibited whether committed by managerial or non-managerial employees, contractors, vendors or customers. Harassment can include verbal conduct (such as racial or sexual epithets, foul language, commentaries about a person's body), physical conduct (for example, improper touching or assault) and/or visual harassment (for example, racially or sexually explicit or derogatory posters, cartoons, electronic images or obscene gestures). Even if such actions do not rise to the level of legally actionable conduct they are nonetheless prohibited in International Paper's workplace. In addition, offering or implying to offer employment benefits in exchange for sexual favors is prohibited.

PAY TRANSPARENCY POLICY STATEMENT

International Paper is a federal contractor. The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

COMPLAINT PROCEDURES

International Paper has established procedures for reporting possible violations of the company's policies against discrimination and harassment. Employees, who have a reasonable belief that they or any other employees have been the victim of harassment, bullying or discrimination or any other violation of policy, are encouraged and expected to report the conduct to management. Any such report should be made promptly so that, whenever possible, any problem can be remedied at the earliest opportunity. Reports of can be made directly to:

- your supervisor or manager
- your supervisor's supervisor or manager's manager
- a Human Resources representative, or
- the HelpLine (1-800-443-6308)

Employees who engage in behavior that violates the company's policies will be subject to disciplinary measures up to and including termination.

Mark Sutton
Chief Executive Officer and President