

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.

The Purpose of this Code. 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”). The Code’s principles are minimum requirements for doing business with International Paper. 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. 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 also to respect the Code’s principles even if local law or custom does not require it. 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.

Prohibition on Child and Forced 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.

Employment Eligibility. 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.

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.

Business Conduct and Ethics

Corruption, Bribery and Financial Crimes. 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. Third parties must not engage in or assist any third party with any money laundering, terrorist financing or other financial crime activities. Third parties are responsible for implementing necessary controls and conducting appropriate due diligences to prevent and detect corruption in its business arrangements and contracts.

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. In addition, third parties must comply with laws prohibiting trading, directly or indirectly, in securities while in possession of material non-public information.

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.

Check with your International Paper contact before providing any gift. Third parties should not give or promise a gift to influence a decision or otherwise violate International Paper's gift policy.

Intellectual Property. 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. In addition, International Paper expects Third Parties to respect the intellectual property rights of others and not use other parties' unlicensed software or technology in support or in connection with work for International Paper.

Data Privacy and Confidential Business Proprietary Information. Third parties must take all reasonable and appropriate measures to safeguard personal and confidential business proprietary information obtained during the course of their business relationship with International Paper. Third Parties shall protect personal and confidential business proprietary information from unauthorized use, transfer, disclosure, access, loss, alteration, damage and destruction. Third Parties must handle personal data and confidential business proprietary information only as authorized and directed by International Paper and in compliance with applicable data privacy laws.

Similarly, confidential business proprietary information disclosed to a Party must be protected at all times. Such information must not be disclosed to unauthorized parties or used for any purposes not authorized by International Paper.

Acceptable Use of Technology and Systems. International Paper is committed to high standards of information security, data privacy and compliance with all data protection laws and we expect the same from our third parties. We expect our third parties to take all reasonable technical,

organizational and security measures to prevent unauthorized use, transfer, loss, destruction or damage to any confidential business proprietary or personal information transferred to them.

Third parties may be loaned International Paper equipment and may be provided access to network, email and other electronic devices. International Paper expects third parties to respect and comply with security standards and controls and use International Paper provided information technology for authorized International Paper business purposes.

Third parties are prohibited from inappropriate use of electronic communication tools provided by International Paper, including:

- Email address
- Collaborative tools, including instant messaging and video conferencing
- Electronic file management systems
- Internet access
- Intranet access
- Company data network
- Telephone communication
- Printers, fax machines and photocopiers

Inappropriate use includes:

- Bypassing or circumventing security controls or restrictions
- Excessive personal use that could disrupt network traffic (e.g., streaming movies)
- Storage of International Paper's information assets in an environment maintained by a third party with whom IP does not have a contractual relationship
- Creating, accessing, distributing or storing materials that could be considered unethical, inappropriate, offensive or abusive
- Conducting illegal activities, creating or sending any material that is intimidating, harassing, threatening, abusive or sexually explicit
- Representing International Paper without appropriate authorization
- Activities that are not related to International Paper business

All data stored or transmitted on International Paper equipment is the property of International Paper. Third parties are expected to maintain direct control of corporate devices to prevent theft, damage and misuse and report immediately if devices or data are lost, stolen or accessed by unauthorized persons. Third parties shall notify International Paper immediately regarding any suspected or actual data breach at My-Privacy@ipaper.com.

Be aware that International Paper may monitor all use of its corporate network and may access all data received or transmitted using the International Paper network to the extent permitted by law.

Third parties must return all International Paper assets in their possession at the end of the project or engagement or at any time as directed by International Paper.

Artificial Intelligence and Automated Decision Making. International Paper expects third parties will commit to developing, deploying or using artificial intelligence (AI) in a manner that aligns with International Paper's Responsible AI principles, which include:

- Accountability - having an appropriate organizational strategy or framework to ensure compliance with evolving legal, ethical and social expectations
- Ethics and Fairness - designing and using AI to treat all individuals fairly without discrimination or bias and monitoring to avoid unintended consequences
- Transparency and Responsible Disclosure -- providing clear information and explanation to humans interacting with AI
- Privacy and Data Governance - conducting appropriate impact assessments
- Security - developing and monitoring AI to operate securely to protect information assets

Third Party Cyber Security Responsibilities. International Paper expects third parties with access to International Paper Information Technology networks and systems or International Paper data to maintain a Cyber Security Program aligned with current Cyber Security standards and best practices. Third parties are expected to respond to requests for information by International Paper's Third Party Risk Management program.

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 USA Direct outside North America).