

## **Political Donations and Activities Policy Statement**

Current as of 09/03/2019

It is International Paper's policy to obey all global laws that govern our political donations and activities in all regions across the company. International Paper does not use company funds to make political donations outside the United States. Within the United States, it does not contribute to U.S. federal candidates, federal campaigns or national political parties. Where allowed by law, International Paper may make political donations in the United States at the state or local level. All contributions made by International Paper promote the interests of the company and are made without regard for the private political preferences of any Company employee or officer. Only the Vice President of Global Government Relations is authorized to make decisions related to giving company resources to candidates, parties, campaigns or committees to ensure compliance with International Paper's Political Donations and Activities policy. The company reports all such contributions in accordance with applicable law and includes them on the company's voluntary disclosure of corporate political contributions.

International Paper supports participation by its employees in the political processes of their communities, states and countries. However, no employee may use company resources for private political participation. Our employees must report to the Global Ethics and Compliance office if they intend to run for office.

Employees that engage in lobbying activities must report such activities and any related expenditures to the Global Ethics and Compliance Office. International Paper complies with all U.S. federal and state laws that govern lobbying activities, including the Lobbying Disclosure Act and the Honest Leadership and Open Government Act, in addition to their state counterparts. Any employee who is involved in political activities, and is unsure how those activities fit in with the company's expectations, should consult the Global Ethics and Compliance office for direction.

Employees who become aware of any actual, suspected or potential violations of this policy or any law governing political donations or political activities must report the violation to an immediate supervisor, the Legal department, the Global Ethics and Compliance office, or the Helpline.