

Third Party & Supplier Code of Conduct

Overview

Global Cellulose Fibers (“GCF”) believes in conducting business with honesty and integrity, treating all people with dignity and respect, supporting our communities and honoring the laws, regulations and treaties of the countries in which we operate. In selecting its suppliers and third-party providers, GCF endeavors to choose reputable business partners who conduct their business in a manner that shows commitment to high ethical standards, safe and healthy working environments, protection of human rights and dignity, protection of the environment and compliance with the law.

This Third Party & Supplier Code of Conduct (“Code”) outlines our expectations regarding the workplace standards and business practices of our suppliers, contractors, consultants, agents, representatives, brokers, distributors, and other third parties who provide GCF goods & services, along with their parent entities, subsidiaries, affiliates, subcontractors, employees and others who are within their supply chain (together, “third parties or supplier”). The expectations contained in this Code are factors essential to our decision whether to enter into or extend existing business relationships. Each supplier is responsible for ensuring that its employees, representatives and subcontractors understand and comply with this Code.

This Code's principles are minimum requirements for doing business with GCF.

The expectations outlined in this Code do not replace specific requirements in contracts. Rather, this Code is intended to supplement the specific requirements in contracts. If a contractual term is stricter than this Code, the third party/supplier must meet the stricter contractual requirement. This Code does not alter contractual terms or constitute express or implied contractual obligations or a contract of employment. If third party/supplier 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/suppliers are responsible for ensuring their employees, representatives, agents and subcontractors understand and comply with these principles.

GCF operates in a global environment and honors the laws and treaties of the countries in which we operate, but certain laws, such as the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and others, apply to the company’s global operations. Therefore, this Code is focused on principles that uphold consistent compliance obligations throughout our global operations. Suppliers are also expected to comply with all laws and treaties of the countries in which they operate; however, within the scope of such compliance, where local or regional laws are less restrictive than the principles of this Code, we expect our suppliers to follow this Code. Conversely, when local or regional laws are more restrictive than this Code, we expect our suppliers to follow the local or regional laws.

Workplace, Labor and Human Rights

Respect and Dignity. Third Parties/Suppliers are expected to keep their workplaces free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse and discrimination.

Wages and Benefits. Third Parties/Suppliers must follow all laws governing wages and working hours, including compensation, benefits and overtime.

Freedom of Association. Third Parties/Suppliers must respect the right of their employees to join or not to join any lawful association without fear of retaliation.

Employment Eligibility and Voluntary Labor. Third Parties/Suppliers shall only employ workers with a legal right to work. Illegal child labor and forced labor are forbidden in any circumstance.

Human Rights. Third Parties/Suppliers must refrain from any conduct — and require their contractors to refrain from any conduct — that uses threats, force or any form of coercion, abduction, intimidation, retaliation or abuse of power for the purpose of exploitation, forced labor or slavery of any individual. Suppliers must comply with all laws governing human trafficking and slavery.

Grievance Process. To the extent appropriate to their size, third parties/suppliers 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

Illegal Payments, Corruption and Bribes. Third parties/suppliers must not engage in illegal payments or corruption or tolerate the offer of gifts, favors or entertainment where they are intended — or appear intended — to obligate the receiver. Third parties/suppliers must not participate in extortion, fraud, embezzlement, bribery or kickbacks. A third party/supplier must use every effort to legally understand and determine when it is dealing with a government official and when a payment may be legitimate rather than a bribe. Third parties/suppliers 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 Ethics and Fiscal Integrity. When providing goods and services, third parties/suppliers must meet their contractual obligations and follow the law. Any representation to GCF must be accurate and truthful. Furthermore, suppliers must keep accurate records that comply with the law.

Conflicts of Interest. Third parties/suppliers shall disclose to GCF any potential conflict of interest, such as when one of their employees (or someone close to the employee) has a relationship with a GCF employee who can make decisions that will affect the supplier's business — or when a GCF employee has any kind of interest in the supplier's business.

Antitrust and Competition Laws. Third parties/suppliers must avoid agreements or actions that illegally limit trade or competition. They may not offer our employees any confidential information about a GCF competitor.

Gift-Giving and Political Contributions. Bribes or inappropriate, lavish or repeated gifts to GCF employees are forbidden, regardless of local custom. Furthermore, third parties/suppliers must not offer entertainment or gifts to government officials — or make direct or indirect political contributions — on GCFs behalf.

Intellectual Property and Data Privacy. Third parties/suppliers must protect all of GCF's intellectual property rights, trade secrets and proprietary information. They must also protect personally identifiable information that they keep for GCF from unauthorized access, destruction, changes, use and disclosure. Third parties/suppliers must handle personal and confidential data and information only as authorized and directed by GCF and in compliance with applicable laws.

Acceptable Use of Technology and Systems. GCF expects its third parties/suppliers 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 are prohibited from inappropriate use of electronic communication tools provided by GCF. All data stored or transmitted on GCF equipment is the property of GCF. Third parties/suppliers shall notify GCF immediately regarding any suspected or actual data breach at DataPrivacy@gcfibers.com. Be aware that GCF may monitor all use of its corporate network and may access all data received or transmitted using the GCF network to the extent permitted by law.

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

- Accountability-having inappropriate organizational strategy to ensure legal and ethical compliance.
- Ethics and Fairness - designing/using AI to avoid discrimination or bias.
- Transparency and Responsible Disclosure
- Privacy and Data Governance-conducting appropriate impact assessments
- Security-monitoring and operating AI securely to protect information assets.

Third Party Cyber Security Responsibilities. GCF expects third parties/suppliers with access to GCF IT networks and systems or data to maintain a Cyber Security.

Program aligned with current standards and best practices. Third Parties/Suppliers are expected to respond to requests for information by GCF's Third Party Risk Management program.

Health, Safety and the Environment Workplace Health and Safety.

We expect third parties/suppliers to promote secure, safe and healthy work sites. Suppliers should have everything in place that is needed to reduce the risk of accidents, injuries and exposure — especially where hazardous materials are present. They must have well-established safety procedures, preventative maintenance and protective equipment in compliance with the law.

Responsibility to the Earth. Third parties/suppliers must comply with all environmental laws, including those relating to hazardous materials, wastewater, solid waste and air emissions. We encourage suppliers to reduce the environmental impact of their operations and safeguard the natural resources on which we all depend, especially through reasonable efforts to reduce or eliminate waste of all types. Such efforts include source reduction, recycling, composting, reusing materials and conserving water and energy.

Accountability and Compliance. Third parties/suppliers must comply with this Code and the law. Suppliers shall be responsible for any monitoring or documenting of their compliance and their efforts to promote compliance within their supply chains. GCF reserves the right to investigate any instances of a supplier's non-compliance of which it becomes aware. Non-compliance may be grounds for GCF to void or terminate contractual obligations with a supplier.

Contact Information

Any questions regarding this Supplier Code of Conduct should be directed to Global Cellulose Fiber's Ethics Office at ethics@gcfibers.com or the GCF HelpLine at 1-833-498-6084.