

Third Party Code of Conduct

Sylvamo is committed to doing business with integrity, treating all people with dignity and respect and honoring the laws that govern our operations. We expect our third parties to do the same, and as a condition of doing business, comply with this Third Party Code of Conduct (“Code”) or similar standards.

Workplace Health and Safety. Third parties shall promote safe and healthy worksites and provide the necessary safeguards needed to reduce the risk of accidents, injuries and exposure. They must have safety rules, preventative maintenance and protective equipment in compliance with the law.

Responsibility to the Earth. Third parties must comply with environmental laws. We encourage third parties to reduce their impact on the environment and to protect natural resources.

Respect and Dignity. Third parties should keep workplaces free of 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.

Voluntary Labor and Employment Eligibility. We do not tolerate prohibited child labor, slave 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.

Ethical Standards. Third parties must refrain from all corruption, including embezzlement, fraud, extortion, bribery or kickbacks and must avoid agreements or actions that evade competition laws. Where permitted, third parties must disclose any

known conflict of interest to Sylvamo. Third parties may not disclose or use any of Sylvamo’s intellectual property rights, trade secrets or confidential information without authorization. They must comply with intellectual property and data privacy laws and take all reasonable precautions to protect personal data acquired while doing business with us – for example, from unauthorized access, destruction, changes, misuse and disclosure.

General Contracting and Fiscal Integrity. When providing goods and services, third parties must meet contractual obligations. Representations must be accurate and truthful. They must not reference Sylvamo’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.

Grievance Process. Third parties should have a 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. Sylvamo will hold their third parties accountable for compliance with this Code or similar standards. They must not do anything illegal on property that Sylvamo owns or leases. We reserve the right to investigate any instance of a third party’s noncompliance with this Code, its own code or the law. Noncompliance may be grounds to void or terminate our contractual obligations.

Reporting. To report noncompliance with this Code, policies or law, email Sylvamo’s Global Ethics and Compliance office at compliance@sylvamo.com or file a report at [HelpLine.Sylvamo.com](https://www.sylvamo.com/HelpLine)

