

# SUPPLIER CODE OF CONDUCT

It is the general policy of Clearwater Paper Corporation and our wholly owned subsidiaries (collectively, "Clearwater Paper") to conduct our business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable law. Additionally, as part of efforts to ensure long-term sustainable business operations we strive to integrate environmental, social and governance factors into our supplier selection process. This Supplier Code of Conduct ("Code") establishes the minimum standards that must be met by any supplier that supply products or services to Clearwater Paper ("Supplier") and our business partners.

This Code is intended to be consistent with all applicable law and to supplement the specific requirements of any Supplier contract. If an applicable law or any contractual term is stricter than the requirements of this Code, Suppliers must meet the requirements of the applicable law or contractual term. This Code does not alter contractual terms, constitute a contract of employment, nor authorize any Supplier to transact or act on behalf of Clearwater Paper.

## Environmental, Health and Safety Responsibility

**Environmental Protection.** Suppliers must comply with all applicable environmental law and implement practices and procedures for the prevention of incidents that may have a negative environmental impact, including managing and reporting the compliance of all facilities, operations, products and product packaging. We encourage our Suppliers to promote and support responsible environmental stewardship, including making reasonable efforts to reduce waste of all types and conserve water and energy.

Workplace Health and Safety. Suppliers must comply with all applicable health and safety law and provide a safe, healthy, and sanitary working environment, including the provision of appropriate personal protective equipment to on-site personnel. Suppliers must implement and actively monitor practices, procedures and safeguards to prevent workplace hazards, accidents, and injuries. Suppliers must take all practical and reasonable measures to ensure that their employees and subcontractors do not use, possess or be under the influence of alcohol, illegal drugs or controlled substances on Clearwater Paper premises or while engaged in any activity related to Clearwater Paper.

Reporting and Corrective Action. Suppliers must report deviations from any environmental, health or safety requirement and take swift corrective action, including reasonable and effective prevention measures, as required. Suppliers should routinely reassess their practices, procedures and safeguards for the purpose of identifying areas for continuous improvement.

Suppliers are directed to review Clearwater Paper's Environmental, Health, Safety and Social Responsibility Policy available on Clearwater Paper's website.

## Workforce, Labor and Human Rights

**Employment Practices.** Suppliers must provide equal employment opportunities. Suppliers will not discriminate in recruiting, hiring, training, compensation, promotion, termination, or any other employment practice based on race, color, national origin, gender, religion, age, disability, or any other characteristic or status protected by applicable law.

**Employment Eligibility and Voluntary Labor.** All labor must be voluntary. Supplier must not support, engage in, or require any compelled, involuntary, or forced labor; labor to be performed by children; bonded labor; indentured labor; or prison labor. Suppliers will not support or engage in slavery or human trafficking in any part of their supply chain.

Workplace Practices and Standards. Suppliers must uphold the human rights of all workers and ensure that they are treated with respect and dignity. Suppliers are expected to keep their workplaces free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse and discrimination. Suppliers must comply with all applicable overtime and maximum hour laws, as well as other applicable regulations.

Wages and Benefits. Suppliers must compensate all workers with wages and benefits relative to the industry and local labor market and, that at a minimum meet the higher of applicable law or collective agreements.

**Freedom of Association.** Suppliers will respect, and shall not interfere with, the right of workers to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Supplier Code of Conduct Page 1 of 2

#### **Business Conduct and Ethics**

**Ethics and Integrity.** Suppliers must conduct their business with the highest level of integrity and ethical standards and in accordance with all applicable law and contractual obligations. This Code covers a wide range of standards, but it does not cover every possible issue that may arise. Suppliers are expected to exercise their own best judgment and discretion within the parameters of this Code and their commitment to ethical conduct.

**Antitrust and Competition.** Suppliers must avoid actual or perceived agreements or actions that illegally limit trade or competition. Suppliers may not offer or give our employees any confidential information about our competitors.

**Anticorruption and Improper Payments.** Suppliers must comply with all applicable anticorruption law, including, but not limited to, the U.S. Foreign Corrupt Practices Act, as amended. Suppliers must implement and monitor policies and procedures prohibiting their employees and subcontractors from offering or giving anything of value to improperly influence government officials.

**Gifts and Entertainment.** Gifts, entertainment, travel or any other form of gratuity may not be given or received by Suppliers as a reward, encouragement or improper influence for preferential treatment.

**Conflicts Minerals.** Suppliers must ensure that the products they manufacture and contract to manufacture (including all inputs and components incorporated into such products) do not contain conflict minerals.

**Insider Trading.** If Suppliers or their personnel know or have access to any material non-public information regarding Clearwater Paper, Supplier must ensure that they do not, directly or indirectly, buy, sell or transact in securities issued by Clearwater Paper.

**Records and Information.** Suppliers must keep accurate financial books and business records in accordance with all applicable law. Suppliers must respect the privacy of their employees and customers and comply with all applicable law in the collection, use and protection of personal information. Suppliers must properly safeguard Clearwater Paper resources and information made available to them and use them only for purposes authorized by Clearwater Paper.

#### **Audit and Accountability**

Suppliers will cooperate with, and provide reasonable access to, Clearwater Paper in the verification of Supplier's compliance with this Code through audits conducted by Clearwater Paper or a third party designated by or otherwise acceptable to Clearwater Paper. In addition, Supplier will provide accurate and complete responses to a request by Clearwater Paper for certification of compliance by Supplier or any other inquiry related to this Code.

Each Supplier is responsible for ensuring that its employees, representatives and subcontractors understand and comply with this Code. We may elect not to work with or cease to work with any Supplier who fails to meet the minimum standards established by this Code.

#### **Asking Questions and Raising Concerns**

We are committed to a culture of transparency and we expect and encourage our Suppliers to raise questions regarding this Code and to promptly report any possible violations of the Code, concerns or misconduct to our confidential and independent hotline. Anonymity of any reporting party will be respected.

# T: 1-888-690-3859

Website: http://clearwatercompliance.alertline.com

We expect our Suppliers to maintain policies and practices that allow and support reporting of violations, misconduct or grievances by workers and stakeholders without fear of retaliation. Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported possible violations or suspected misconduct, or who has sought advice regarding this Code.

Supplier Code of Conduct Page 2 of 2