Guiding Our Choices for Success
The Glatfelter Code of Business Conduct
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I firmly believe a critical component to the success of our business is Glatfelter PEOPLE. As a global leader in our industry, Glatfelter PEOPLE respect each other, our business, and our business partners, and we have succeeded by earning a stellar reputation as a high integrity company for more than 150 years. This is a remarkable accomplishment that we all should be very proud of and feel obligated to preserve and strengthen into the future.

Our Core Values have always been and will continue to be the cornerstone of our business, guiding our choices and enabling our success. When we act with integrity, maintain financial discipline, show mutual respect, keep a customer focus, demonstrate environmental responsibility, and practice social responsibility, we make great strides toward fulfilling our vision to become the global supplier of choice in specialty papers and fiber-based engineered products.

This revised Code of Business Conduct is an updated statement of our identity. Guiding Our Choices for Success outlines what we stand for as a company and connects our Core Values to many of the most important issues we face. It provides guidance on how to conduct ourselves when representing our Company and how we serve our customers, business partners, and the communities where we work and live. We also expect our business partners and those acting on Glatfelter’s behalf to conduct themselves according to this Code.

Thank you for your continued commitment to conducting our business in line with our Core Values. Compliance with this Code will carry all of us, and Glatfelter, forward to future success and ensure Glatfelter’s sustainability.

Dante C. Parrini
Chairman and CEO
Guiding our Choices for Success

We are proud of Glatfelter’s long history and the strategic vision, innovation, and expertise that have made Glatfelter a global leader. Our accomplishments, as well as our prospects, are based not just on what we have done, but how we have done it. The decisions we make and why we make them are key to our continued success. That is why the title of this new edition of our Code of Business Conduct is Guiding Our Choices for Success.

This edition of our Code offers many new features. It includes definitions and explanations for better understanding. We have made our commitment to human rights and other important areas clearer. We hope, as well, that this new edition is simpler to use and easier to read.

One of the most important aspects of Guiding Our Choices for Success is our endeavor to be specific about how each of our Core Values connects to the Code’s most critical provisions. While the Code has evolved, our Core Values remain the same. Embedded in our Core Values is our commitment to compliance with all applicable laws and regulations wherever we are. If you have any questions about the Code, or about the laws applicable to your position, please let me or your manager know.

Speaking out—whether asking the Law Department questions about the Code or anything else; speaking to your supervisor about a product, process, or idea; talking to someone in Human Resources; or using our confidential Integrity Helpline—is very much a part of who Glatfelter PEOPLE are. Speaking out is a source of our strength, ensuring continued progress and innovation. Speaking out about concerns is a measure of our integrity.

Above all, we hope this new edition of the Code is useful to you, helping you make choices that lead to your personal success at Glatfelter and our collective success as, each day, we build on the past and move closer to our vision.

Jill L. Urey
Assistant General Counsel and Chief Compliance Officer
Our Core Values
are at the heart of everything we do. They are the basis of this Code and guide our choices. Making decisions based on our Core Values is what makes us who we are as a company.

Integrity
We act ethically and responsibly in all of our business endeavors at all times.

Financial Discipline
We are responsible for the prudent management of the resources entrusted to us and for the generation of financial value for all constituents.

Mutual Respect
We treat each other with honesty and respect. We recognize that what we have and what we will achieve is through the efforts of our employees. We will strive to provide you with rewarding challenges and opportunities for advancement.

Customer Focus
We are dedicated to understanding and anticipating the needs of our customers and helping them achieve their business objectives.

Environmental Responsibility
We empower employees to take personal responsibility for environmental issues that arise on the job. We strive to prevent pollution by using natural resources efficiently, reducing waste, encouraging recycling and reuse, and reducing adverse environmental impacts relating to our operations, all with the goal to foster environmental sustainability worldwide for the benefit of future generations.

Social Responsibility
We recognize our responsibility to contribute to the betterment of the communities in which we operate and the world in which we live.
Guiding Our Choices for Success

Our success depends on continuing Glatfelter’s 150 plus-year history of principled, values-based decision making. This Code of Business Conduct connects our Core Values to the choices we make, ensuring we conduct our business legally, ethically, and responsibly.

This Code is a system of principles we are committed to upholding everywhere we operate and in everything we do.

Who the Code Covers

The Code covers all Glatfelter PEOPLE, including all employees, contractors, temporary workers, consultants, officers, directors, and agents. We expect the companies and people outside of Glatfelter with whom we work to also meet these standards.

What the Code Covers

This Code is a foundation for us to build on, not a detailed set of rules. It covers many subjects, defining our principles and how they relate to the choices we make. The Code is not intended to cover every situation that may arise but, rather, provides tools and guidance to help us make values-based decisions every day (see also “A Brief Guide to Making Effective Choices for Success” later in the Code, page 24).

The Company may change and amend the Code as it believes is appropriate from time to time at its sole discretion. Any such changes will be made with an official update to the Code.

Conflicts with Local Law and Code Waivers

Acting with integrity begins by complying with all applicable laws and regulations, everywhere we do business and at all times. Our Code and Core Values require us to do more. Because different laws and regulations apply in the different places where we work, and because they change from time to time, a provision of the Code may conflict with an applicable law or regulation. In that situation, we abide by the law.

If you believe there is a conflict between the Code and any applicable law, or if you believe for any other reason that the application of a Code provision exactly as written may not be the right thing to do, contact the Law Department or the Chief Compliance Officer. The Chief Compliance Officer and the Chief Executive Officer are the only Glatfelter employees authorized to approve a waiver of any part of this Code.

Any questions about the content of the Code or particular policies may be directed to a local Human Resources manager, the Law Department, or the Chief Compliance Officer.
**Speaking Out**

Glatfelter PEOPLE speak out whenever we encounter anything that appears to violate the law, our Core Values, or this Code.

**When to Speak Out**

Speak out promptly if

- you are aware of anything that may endanger the life, health, or safety of anyone at a Glatfelter facility or in the communities where we operate
- you have a good-faith belief that anything about a work-related situation is illegal or violates our Core Values, this Code, or any Glatfelter policy

You are also encouraged to speak out with any questions, suggestions, concerns, or ideas for improvement.

**How to Speak Out**

Talking to your supervisor is a good place to start. Showing mutual respect includes speaking directly and openly to the people who report to us and the people to whom we report. If you are uncomfortable speaking to your supervisor, use any or all of the reporting options listed below. Glatfelter will promptly, objectively, and thoroughly investigate all reports and will take action to correct the situation as appropriate. You can reach out to any of the following:

- Your (or any) manager or supervisor
- Any senior leader of the Human Resources Department
- The Law Department
- The Chief Compliance Officer by phone at +01 717-225-2066 (from outside the USA, dial the appropriate country code) or by e-mail at GeneralCounsel@glatfelter.com
- The Board of Directors’ Audit Committee Chairperson by e-mail at Audit_Committee_Chair@glatfelter.com
- The Integrity Helpline (see back cover)

Employees covered by a labor agreement may have different or additional channels and procedures for expressing their concerns. Glatfelter will comply with those agreements and with all local laws regarding receiving reports, conducting investigations, and addressing violations.

**Participating in Investigations, Audits, and Litigation**

On occasion, you may be asked to provide information to Glatfelter personnel, external auditors, or government representatives who are conducting an investigation or audit. Or, you may receive a notice from the Law Department asking you to locate and retain electronic or paper records. In each of these situations, acting with integrity requires you to cooperate fully and honestly. No one may ever alter, delete, destroy, or hide work-related documents, e-mails, or any other type of records or data related to an audit, investigation, or lawsuit.
Contact the Law Department if you have any questions about what to do, what to keep or discard, or whether you should speak to an auditor, regulator, or investigator.

Seek advice from the Law Department before responding to a nonroutine request directed to Glatfelter for information from a government or regulatory agency. Only the CEO, the corporate head of Human Resources, or the Law Department may respond to such requests on behalf of Glatfelter. All written or electronic requests directed to Glatfelter must be forwarded to the Law Department promptly (no more than 48 hours after receipt). Politely ask government or regulatory agents visiting the workplace, or anyone attempting to serve legal papers or subpoenas on Glatfelter or an employee, for their credentials and ask them to wait until you can contact the Law Department for further direction.

Prohibiting Retaliation

When Glatfelter PEOPLE speak out, they do so as concerned employees who deserve our respect and gratitude.

We do not tolerate any form of retaliation against anyone who reports conduct or activity they believe violates this Code, participates in an investigation, or files a good-faith complaint of any sort. We prohibit retaliation, whether the employee is reporting, participating, or filing internally through Glatfelter channels, or externally through a government agency or system.

Our Core Values of mutual respect and integrity guide us to speak out for ourselves and others. If you experience an act of retaliation, speak out. Report it immediately, using any of the reporting options listed above.

Some Examples of Possible Retaliation

• Being fired, demoted, or reassigned without good reason
• Being denied a promotion or other opportunity
• Being held to different standards of conduct or performance than others
• Being bullied or ostracized by or with the consent of management

Other references: Whistleblower Policy and Procedures
Integrity

We act ethically and responsibly in all of our business endeavors at all times.

Conflicts of Interest

Integrity requires making work-related decisions in the best interests of Glatfelter. We must not let personal considerations influence our business decisions or cause us to act against the best interests of the Company. A conflict of interest occurs when our personal, business, or investment interests conflict with the interests of the Company and prevent us from making decisions objectively or interfere with our loyalty to the Company.

Why Conflicts Matter

When we all work together, we all succeed together. When one of us makes decisions for a different reason, success becomes more difficult.

Even the appearance of a conflict of interest can be harmful. For example, we don’t want an employee to be supervised by a close friend, because even if she is doing a great job, other employees will likely feel she is receiving unfair or special treatment. Similarly, if a potential supplier believes that a Glatfelter request for proposal favors a competing supplier because of a personal relationship, we might never see the potential supplier’s best offer.

Not every potential conflict of interest is unacceptable. For example, while owning or being active in a competitive business is not permissible, owning a small amount of stock in another publicly traded company in our industry is generally not a problem.

How to Deal with Possible Conflicts

Whatever the situation, you must disclose any possible conflict as soon as it arises. You may disclose any potential conflict to your immediate supervisor, Human Resources, the Law Department, or the Chief Compliance Officer. In some cases, disclosure alone does not resolve the conflict, and other steps may need to be taken.

Conflicts can have serious consequences. Your disclosure and the Company’s response should be complete, clear, and in writing.

A conflict of interest can arise in many different ways

- Working for or owning a part of a company that competes with Glatfelter in any significant way, or is a Glatfelter customer or supplier
- Holding a second job that takes so much time or effort you cannot give Glatfelter your very best efforts
- Hiring, promoting, or making any employment decisions about a family member or a close personal friend
- Doing business on behalf of Glatfelter with any company that employs or is owned, even in part, by a family member or a close friend

Other references: Conflicts of Interest Policy
**Gifts and Gratuities**

Giving and receiving gifts, meals, and entertainment is a small but customary part of how we develop and maintain business relationships, but they should not affect, or appear to affect, our impartial decision making or the decisions of our business partners.

**Giving Gifts**

Gifts given in the course of a business relationship that meet the acceptable gift standards are generally permitted, particularly if they are prominently branded with a Glatfelter logo. The circumstances surrounding the gift also matter. For example, a gift given publicly to a long-term customer is not the same as a gift given privately to a potential customer while a proposal is pending. Before offering a gift, also consider whether receiving it would be permissible and appropriate in light of local customs and the policies of the recipient’s employer.

If you are unsure about whether a gift is appropriate, contact the Law Department, the corporate head of Human Resources, or the Chief Compliance Officer for guidance.

**Receiving Gifts**

It is acceptable to receive, but not to solicit, an occasional gift from a supplier or customer. The same acceptable gift standards apply. Occasions may arise when refusing a gift of higher than nominal value would be embarrassing for the gift giver or a breach of business etiquette. In these instances, it is permissible to accept the gift, but only on behalf of Glatfelter. If this occurs, report the acceptance of the gift and give it to your supervisor for final disposition by the Company.

**Meals and Entertainment**

Another way we foster strong working relationships is by sharing reasonable meals and entertainment with our business partners. The food and entertainment we share must be legal, not lavish or excessive, and in connection with legitimate business meetings or events.

Integrity and financial discipline are our guides when making choices about gifts, meals, and entertainment. Because these choices are often difficult and subject to scrutiny, it is critical to keep complete and accurate records of all gifts given or received, especially if required by local laws.

**Government Officials or Employees**

When it comes to government officials, even gifts that are tokens or promotional items (like calendars or pens) require the prior approval of the Law Department, the corporate head of Human Resources, or the Chief Compliance Officer. Glatfelter PEOPLE do not offer or give anything of value to government officials anywhere in the world to influence their decisions or secure any sort of advantage for the business. Nor do we permit anyone else—such as agents, consultants, or business partners—to do so on our behalf. Even a small gift to a government official may be considered an illegal bribe.

Promptly advise the Law Department, the corporate head of Human Resources, or the Chief Compliance Officer if you have any questions about, or knowledge of, gifts or anything of value given to or received from government officials.

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**Acceptable gifts**

- must be within the policy value limits;
- must be legal;
- may not be cash or check or gift cards; and
- must not have the potential to be seen as influencing a business decision.

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**Other references:** Conflicts of Interest Policy and Anti-Corruption Policy
Fighting Corruption

Glatfelter PEOPLE succeed through honest, legal means, and we do not compromise our values by engaging in bribes, kickbacks, or other corrupt conduct. Acting with integrity means that we never try to influence other peoples’ business decisions by enriching them personally, and we do our part to eliminate corruption wherever we do business.

Corruption in all its forms—bribes, kickbacks, and other efforts to corrupt the decision making of third parties—is serious and destructive. It drags down economies, drives up prices, distorts markets, and slows the pace of innovation. Even the appearance of improper influence can trigger expensive and time-consuming global investigations and, if substantiated, can lead to crippling fines for the Company and prison time for the individuals involved.

We comply with all applicable laws, rules, and regulations, and we hold ourselves to an even higher standard, based on our Core Values. This standard is reflected in a single global principle:

*Giving or paying anything of value—whether in the form of bribes, kickbacks, gifts, jobs for family members, or anything else—to obtain or keep business or to secure a business advantage (like getting a permit, clearance, or approval from a government agency) is strictly prohibited.*

This principle applies equally to all of our business dealings. It applies whether or not:

- such behavior has historically been considered normal business practice in the particular location
- local anti-corruption laws are commonly enforced
- it is done directly by a Glatfelter employee
- it is done by or through a third party
- the intended recipient is a government official
- it is common practice among our competitors

*Other references: Anti-Corruption Policy*

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**Who is a “government official”?**

A political candidate or anyone who works for or runs

- any government organization at any level
- a government-owned or -controlled business
- a public international organization (like the EU or the UN)
- a political party

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**What are some examples of a “thing of value”?**

- Meals
- Entertainment
- Gifts
- Jobs or other benefits for family members
- Gratuities
- Certain charitable donations
- Most travel expenses
Doing Business Globally

Anti-corruption laws apply to Glatfelter’s activities everywhere we do business. Both the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act apply when we conduct business abroad. Under the FCPA and other country-specific antibribery laws, any expenses or gifts involving government officials (as defined on the previous page) are subject to higher levels of scrutiny and may be seen as evidence of corruption, even if the values of the items involved are very low. Also, describing a payment to a third party as a “finder’s fee” or “commission” when the money is actually going to be passed along to someone whose decision it is intended to influence is a crime in and of itself, whether or not corrupt intent can be shown. The law requires that our books, records, and accounts accurately and fairly detail all payments, expenses, and transactions so their actual purpose and amount is clear.

If you are ever uncertain whether a payment or business arrangement, or the accounting for it, is legitimate or appropriate, speak out. Contact the Chief Compliance Officer, Human Resources, or the Law Department promptly with your questions or information.

Other references: Anti-Corruption Policy

Social Media

Social media is vital to our future, allowing us to attract new customers and interact with existing ones, share information about Glatfelter with a global audience, and generate excitement about Glatfelter’s brand and products. Social media is powerful, but challenging—virtually everything we post becomes available for all to see.

Glatfelter PEOPLE use social media wisely. Our culture and our values are on display. We show mutual respect when we interact with co-workers on social media, never posting offensive content or what others might see as harassment or bullying.

When using social media, we do not speak on the Company’s behalf unless specifically authorized to do so. We make it clear that we are speaking for ourselves, not for Glatfelter. We avoid posting photos, video, links, or comments that may appear to be endorsed by Glatfelter when they are not.

Other references: Social Media Policy (U.S.), Spokesperson Policy, and Corporate Identity Guidelines
Financial Discipline

We are responsible for the prudent management of the resources entrusted to us and for the generation of financial value for all constituents.

Protecting Company Assets

Every day, Glatfelter PEOPLE are entrusted with Glatfelter’s assets, from our buildings and equipment to our bank and investment accounts. Company assets also include intellectual property, the embodiment of all of our ideas and creativity. Maintaining financial discipline means keeping all of our assets safe from loss or damage and using them as intended for the benefit of the Company and all of its stakeholders. Financial discipline begins with investing Company resources wisely and well.

Accuracy of Company Records

Financial discipline depends on maintaining accurate records. All Glatfelter PEOPLE enter information into our financial systems in some way, from submitting time cards to preparing corporate tax returns. We each have a responsibility to do so honestly and accurately.

Nonfinancial records can be just as important as financial records. Whether production logs, quality testing, or emissions records, the accuracy of all records is critical to our success. Acting with integrity means never knowingly making an inaccurate or false statement about the Company’s business or operations.

Other references: Anti-Corruption Policy, Code of Business Ethics for CEO and Senior Financial Officers, and Spokesperson Policy

Protecting Confidential Information and Trade Secrets

We are entrusted with confidential information belonging to the Company, our customers, our suppliers, and others. We earn and maintain that trust every day by using confidential information properly and never disclosing it without proper authorization.

Confidential information can be anything not generally known to the public. Unless and until it is intentionally disclosed to the public by or on behalf of the Company, virtually all information we create in the workplace should be treated as confidential, including all our books and records, projections and plans, formulas, designs, and lists.

A trade secret is confidential information that is valuable because it remains a secret. Until made public, most every innovation or improvement is a trade secret, providing valuable competitive advantage because it is not known outside of Glatfelter.
To help protect this information, we

- do not speak to media representatives or industry analysts on behalf of or about Glatfelter unless specifically authorized to do so
- do not discuss confidential matters where strangers, unauthorized co-workers, vendors, business associates, family, or friends might overhear the conversation
- use caution about displaying confidential information in close quarters, such as on trains or airplanes or in public places
- do not leave confidential information where it might be lost, stolen, or improperly accessed
- do not transmit confidential information or trade secrets using our personal electronic devices except as specifically permitted by Glatfelter policy

We never reveal our confidential information or trade secrets to third parties, unless there is a good business reason to do so and the other party has signed a nondisclosure or confidentiality agreement (as approved by the Law Department).


Insider Trading

Some confidential information may be of interest to the people who buy and sell our stock. This material nonpublic information includes

- financial results before they have been released
- pending or possible divestitures, mergers, or acquisitions
- significant new product developments
- leadership changes
- anything else that might have an impact on our share price

Acting with integrity requires us not to use Company confidential information for personal benefit or share that information with anyone else. Insider trading—using material nonpublic information for financial gain by buying or selling Company stock or other securities—is unethical, prohibited by this Code, and generally illegal.

Other references: Insider Trading Policy

Creating Company Assets

Glatfelter PEOPLE innovate. We keep our customer focus by finding new ways for our customers to achieve their objectives. Because we work for Glatfelter, we do not personally own any rights in any invention or innovation we create at work or with Company assets or information. The Company owns them, except where local law provides otherwise. If you have developed something you think is new—an invention, an innovative product or process, or a new application—create a written record of it. Then promptly get in touch with your manager or the appropriate technical personnel to make sure it is properly disclosed and protected and can be used without infringing a third party’s rights.
Respecting the Rights of Others

Acting with integrity means we respect the intellectual property rights of others. Before we use a product or innovation seen elsewhere, we should be sure no other company or individual has any right to it. We must consider and respect copyrights before copying or redistributing any copyrightable work that is not the property of Glatfelter.

Respecting the intellectual property rights of others is also a matter of financial discipline. Violating the rights of others is illegal and can be costly. If you have any question about whether or how to use intellectual property, check with the Law Department.

Software

Other companies build almost all of the software we use, and they license it to us. These licenses often limit the number of authorized users of the software within the Company. Copying any Glatfelter-owned software onto any other devices, even if it is for business purposes, requires prior approval from the Information Technology Department.

Information Security—Company Systems

All the electronic systems we use at Glatfelter—including computer systems, Internet access, telephone and e-mail, and all the Company-provided devices we use to access them—are Company property. They are intended for business purposes.

Occasional, reasonable personal use of Company systems is permitted, whether or not during working hours, if it does not interfere with the Company’s business or your job performance. Some uses of Company systems and Company facilities of any kind are never acceptable. These include

- gambling
- accessing, downloading, uploading, saving, receiving, or sending sexually explicit content
- using offensive, discriminatory, or harassing language
- executing work for other employment outside Glatfelter
- any illegal activity

Whenever we use Glatfelter’s electronic systems and equipment, whether on or off Company premises, we should not expect that our communications will be private. Subject to local applicable laws and agreements, the Company may monitor, access, and inspect such systems and equipment at any time and without notice.
Antitrust and Competition

Glatfelter competes vigorously, and our Core Values are at the heart of how we compete. Acting with integrity requires we compete fairly. We maintain our customer focus and practice social responsibility when we comply with both the letter and the spirit of competition and antitrust laws, which protect the interests of consumers as well as competition itself.

Compliance with Competition Laws

Competition laws generally prohibit agreements between competitors concerning pricing, bids, territories, terms of sale, allocation of customers or markets, levels of production, and refusing to deal with specific customers or suppliers. Though these laws can be complex, compliance with them is generally simple. Never enter into any agreement of any kind with a competitor without the prior approval of the Law Department—no written agreements, no oral agreements, no handshakes, and no unspoken agreements or “mutual understandings.”

Competition laws also prohibit certain types of agreements with customers and suppliers and some other marketing practices. These include setting the prices our distributors may charge for our products, allowing suppliers to explicitly influence our pricing, and taking steps that may force a competitor out of business or out of a market.

In some situations, there may appear to be an anticompetitive agreement even where one does not exist. It is important to be very careful about what we say to or hear from competitors. Glatfelter PEOPLE never speak to competitors—either directly or through a third party—about prices, terms, bids, or marketing plans. Consult the Law Department with any questions, concerns, or plans.

Trade Associations and Industry Events

Attending trade association meetings and other industry events is an important part of our general business activity, but it can also cause concern, since it presents many opportunities for improper communications. Glatfelter PEOPLE are careful of what we say. We never talk or joke about market share or competitive advantage, and we avoid even the appearance of doing so. Contact the corporate head of Human Resources for approval prior to providing materials for distribution or discussion at trade associations or industry events. If you are uncertain about what you can and cannot say in such settings, contact the corporate head of Human Resources or the Law Department.

Other references: Spokesperson Policy

Trade Controls

We act with integrity by complying with all of the laws governing the shipment of our goods and technology across international borders or restricting our ability to do business with certain people, companies, or countries. While national laws apply wherever we do business, because our company is headquartered in the United States, the activities of Glatfelter PEOPLE everywhere may be subject to U.S. law.
If you are involved in cross-border transactions of any kind and have any questions or concerns about the applicable regulations or requirements, contact the Law Department.

Export Controls

Whenever we move goods or send technology across international borders, even to other Glatfelter operations, export regulations apply. Some exports require an export license, while others are prohibited entirely because of the nature or location of the intended recipient.

While most Glatfelter products and technologies do not require licenses, they do require proper, complete, and accurate paperwork, such as shipping documents, product classifications, and declarations of end use. All Glatfelter PEOPLE involved in any international trade or technology transfers must understand these requirements.

Sanctions and Embargoes

Both the United States and the European Union maintain lists of persons and entities with which we may not do business, generally because they are involved in the proliferation of nuclear weapons, terrorism, or the global narcotics trade. There are also embargoes, which are restrictions on doing business with certain countries or regimes subject to political sanctions. It is important to monitor embargoes and sanctions, because they change frequently.

Boycotts

A boycott is an attempt to harm or punish a country by interfering with its trade. We do not support or even provide information to others supporting boycotts not authorized by our own governments. Should you receive a request for boycott-related information, report it to the Law Department immediately.

Other references: Import-Export Compliance Policy, Anti-Corruption Policy, Import-Export Procedure for High-Risk Jurisdictions, Spokesperson Policy, and business unit-specific import-export procedures and supply chain security procedures
Mutual Respect

We treat each other with honesty and respect. We recognize that what we have and what we will achieve is through the efforts of our employees. We will strive to provide you with rewarding challenges and opportunities for advancement.

Diversity and Equal Employment Opportunity

Glatfelter is a global company, and we endeavor to recruit, hire, and retain the best people we can to support the markets and consumers we serve. Diverse experiences, perspectives, and backgrounds of Glatfelter PEOPLE expand the Company’s knowledge base, skills, and cross-cultural capabilities, providing the Company with a sustained competitive advantage. Mutual respect requires us to understand and appreciate such diversity within our Company.

All of our employment decisions, including hiring, career development, promotions, and discipline, are based on an individual’s merits and the Company’s needs. All Glatfelter employees and applicants are entitled to equal employment opportunities, regardless of

- race
- color
- religion
- national origin
- ancestry
- gender, gender identity, or gender expression
- sexual orientation
- age
- physical or mental disability
- veteran or military status
- other protected characteristics

If you experience an act of discrimination, speak out. Our Core Values of mutual respect and integrity guide us to speak out for ourselves and others. Report any act of discrimination immediately, to any of the people and through any of the processes listed in this Code. We strictly prohibit retaliation against those making good-faith reports of discrimination.

Other references: Equal Employment Opportunity Policy and Affirmative Action and Nondiscrimination Program
Harassment and Bullying

Glatfelter PEOPLE treat each other with respect, creating a safe, positive, and professional working environment. We do not engage in or tolerate harassment, discrimination, bullying, or inappropriate behavior, and we avoid conduct that would adversely affect the work environment or that others may find offensive, intimidating, or degrading. We show respect to, and expect it from, our supervisors, co-workers, vendors, clients, customers, and contractors.

Harassment is speech, behavior, or conduct that creates an intimidating, hostile, or offensive work environment, or negatively affects a person’s job opportunities or performance. Sexual harassment is any harassment based on someone’s sex or gender and encompasses a broad spectrum of conduct. Bullying is humiliating, intimidating, threatening, or abusing a person when the conduct creates a hostile or offensive work environment or negatively affects job opportunities or performance.

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<th>Some Examples of Harassment</th>
<th>Some Examples of Sexual Harassment</th>
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<tr>
<td>• Slurs, epithets, and any other offensive remarks</td>
<td>• Unwanted sexual advances, propositions, or comments</td>
</tr>
<tr>
<td>• Improper jokes, whether written, spoken, or electronic</td>
<td>• Offering an employment benefit in exchange for sexual favors, or threatening a negative employment action for an employee’s failure to engage in sexual activity</td>
</tr>
<tr>
<td>• Threats, intimidation, or other menacing behavior</td>
<td>• Leering, making sexual gestures, or displaying sexually suggestive objects or pictures</td>
</tr>
<tr>
<td>• Other offensive spoken, graphic, or physical conduct</td>
<td>• Sexually graphic or degrading comments</td>
</tr>
<tr>
<td></td>
<td>• Suggestive or obscene letters, notes, or invitations</td>
</tr>
<tr>
<td></td>
<td>• Physical conduct, such as touching, assault, or impeding or blocking movement</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Some Examples of Bullying</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Behaving aggressively</td>
</tr>
<tr>
<td>• Teasing or practical jokes</td>
</tr>
<tr>
<td>• Pressuring someone to behave inappropriately</td>
</tr>
</tbody>
</table>
How We Handle Harassment, Bullying, and Inappropriate Behavior

We avoid harassment, bullying, and inappropriate behavior by always being respectful and professional. Showing mutual respect means putting ourselves in the shoes of the person experiencing the behavior. That person's perception is important, not the intention of the person engaging in the conduct.

When we experience harassment, bullying, or any other inappropriate behavior, Glatfelter PEOPLE speak out. If the behavior is not severe, we may speak directly to the responsible person. If it is severe, however, or continues after it has been discussed, we bring it to the attention of our supervisors, Human Resources, the Law Department, or the Chief Compliance Officer.

Other references: Anti-Harassment Policy

Data Privacy

Collecting personal information about employees, job applicants, customers, and others is a necessary part of running the Company. We collect personal information properly, maintain it safely, and disclose it only as required to do our work and as permitted by law and our policies. We do not discuss or disclose personal information collected by or about Glatfelter PEOPLE for any other reason. We do not give access to personal information to other employees unless they need it to do their jobs.

Many of us have positions requiring us to create or maintain records of personal or sensitive data about others, including contact information, banking information, salary and benefit details, performance reviews, disciplinary communications, and attendance records. We trust one another to create them carefully and maintain them in the strictest confidence.

The Company’s individual employee records are confidential and solely the property of Glatfelter. Our employee records will not be provided to current or former employees or third parties unless required by law.

Other references: European Safe Harbor Privacy Policy for Employee Information, European Safe Harbor Privacy Policy for Customer Information, Personal Data Privacy and Protection Policy, and Protection of Personal Information Policy (Canada)

Employee Safety and Health

Safety and health are embedded in our core values of integrity and social responsibility and are everyone's responsibility. Injury Free Every Day is our safety mission. We honor our commitment to safety and live our Core Values by complying with all safety rules and regulations and by developing internal safety standards, programs, and employee training.

No task is so urgent that we put safety or health at risk to complete it on time. No one at Glatfelter is authorized or expected to compromise the safety or health of others for any reason.

We make prompt, accurate reports of all employee injuries and other incidents that threaten the public or the environment. If you see something that you think is a threat to your safety or health, or to the safety or health of anyone else, speak out. Contact your supervisor, the Human Resources Department, or your local safety coordinator or call the Integrity Helpline.

Other references: Global Health and Safety Policy
Drug-Free and Alcohol-Free Workplace

Glatfelter PEOPLE know drugs and alcohol are incompatible with a safe and productive workplace. We do not show up for work under the influence of alcohol, non-prescribed drugs, or any other substance that might interfere with our safety or performance on the job. We do not carry, keep, or consume alcohol or illegal drugs anywhere on Company premises. The proper use of prescribed or over-the-counter medicine is permitted, provided its use does not impair your ability to work safely and effectively.

Subject to the terms of local law, the Substance Abuse Policy, and any applicable union or works council agreement, you may be required to undergo substance abuse testing at the Company’s discretion. If the results are positive, disciplinary action may result.

Other references: Substance Abuse Policy and applicable local collective bargaining or works council agreements

Solicitation and Distribution of Materials in the Workplace

We strive to provide and maintain a work environment characterized by mutual respect and free from undue distractions. To prevent unnecessary interruption and annoyance, we prohibit the physical and electronic distribution of literature in work areas and the solicitation and distribution of literature during employees’ working time, when we are engaged in our work and fulfilling our responsibilities. Solicitation or distribution of any kind by nonemployees on Company premises is prohibited at all times. Even if Glatfelter has approved the solicitation, our Core Values require us to show mutual respect and not create a distraction that disrupts others’ work.

Nothing in this section should be interpreted as prohibiting employees from discussing the terms and conditions of their employment.

Other references: Charitable Giving Process and Anti-Corruption Policy
Customer Focus

We are dedicated to understanding and anticipating the needs of our customers and helping them achieve their business objectives.

Product Quality and Safety

Maintaining our customer focus means producing quality products that are safe, comply with applicable laws and regulations, and consistently meet or exceed product specifications and other Company standards.

We follow all quality procedures and meet all safety standards involved in the manufacture and production of our products and the maintenance and use of our facilities, equipment, and materials. We do not make unauthorized changes to procedures to save time and we do not take chances.

Each of us is responsible for understanding and following all of the quality procedures and safety standards related to our work. If you see that procedures or standards are not being followed, or if you have any other reason to be concerned about the quality of our products, speak out. Report any concerns affecting the safety of our people or others without delay.

For more information, please consult mill management for mill-specific and product-specific policies, procedures, and specifications.

Honest and Ethical Marketing

Glatfelter PEOPLE compete and succeed by earning and maintaining our reputation for integrity.

- We market and sell our products on their merits, and not by falsely disparaging our competitors or their products.
- We do not collect or seek the confidential information of any of our competitors from their current or former employees, customers, suppliers, or anyone else.
- We do not profit from information to which we have no legal or ethical right.
- We do not misrepresent facts to gain a competitive edge.
- When in discussions with anyone outside of the Company, we do not comment on rumor or speculation regarding any competitor.

Sometimes confidential information is disclosed by accident. We take care not to let that happen. If we improperly receive or happen upon information belonging to someone else, we immediately contact the Law Department for guidance.
Environmental Responsibility

We empower employees to take personal responsibility for environmental issues that arise on the job. We strive to prevent pollution by using natural resources efficiently, reducing waste, encouraging recycling and reuse, and reducing adverse environmental impacts relating to our operations, all with the goal to foster environmental sustainability worldwide for the benefit of future generations.

Glatfelter PEOPLE care about the impact our business has on the environment. We demonstrate environmental responsibility by continually striving to reduce the adverse environmental impacts of our operations and by fostering environmental sustainability in and around the communities where our facilities are located.

We are committed to complying with environmental laws, regulations, and permits specific to our operations, and we encourage our facilities to seek third-party certification to applicable environment, energy, and sustainable forestry standards. Responsible and sustainable forestry and agriculture are critical to meeting our customers' product needs today and ensuring viable fiber resources for our operations well into the future.

We must speak out if we see a serious threat of any kind to the proper functioning of our environmental management systems or that could damage the Company. To report an environmental threat, contact the appropriate environmental coordinator at your facility. You are also encouraged to share ideas about how to improve our environmental footprint.

Other references: Glatfelter’s Commitment to Sustainability, Sustainability Brochure, Sustainable Forest Policy (SPBU), and individual business unit environmental policies
Social Responsibility

We recognize our responsibility to contribute to the betterment of the communities in which we operate and the world in which we live.

Human Rights

Glatfelter respects the basic rights to which all human beings are entitled and is committed to protecting them globally. We recognize international principles of human rights as expressed in the United Nations Declaration of Human Rights and by the International Labour Organization (ILO).

Practicing social responsibility means respecting human rights in conducting our business. Glatfelter is committed to providing safe, healthy working conditions. We comply with applicable employment laws wherever we operate, and we respect the free association and collective bargaining rights of our employees. We also expect our suppliers and business partners to respect human rights.

Child and Forced Labor

We practice social responsibility by refusing to engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labor. We do not employ anyone below the age of 15, or anyone who is younger than the local age of mandatory schooling, in any of our operations. We do not employ anyone who is working involuntarily or under threat of penalty.

We expect our suppliers and contractors to uphold the same standards and encourage them to demand the same of their suppliers and contractors.

Other references: Statement of Principles on Child Labor and Forced Labor, Import-Export Compliance Policy, and business unit-specific import-export procedures and supply chain security procedures

Political Contributions and Public Expressions

Glatfelter PEOPLE are encouraged to take an active role in the civic and political life of their communities. When we do, we always make it clear that we are speaking, acting, or donating funds to a campaign on our own behalf and not on behalf of the Company.
Acting with integrity means that we never make direct or indirect political contributions of Company funds or resources on our own, whether or not such contributions are legal. Contact the corporate head of Human Resources for approval before

- donating or using Company funds, resources, or assets for political or public policy purposes
- hosting an elected official or candidate for office on Company premises
- expressing an opinion on a political or public policy matter on behalf of Glatfelter

*Other references: Anti-Corruption Policy and Conflicts of Interest Policy*

**Supporting Our Communities**

Glatfelter PEOPLE practice social responsibility by volunteering and participating in charitable activities in ways that are consistent with this Code. We may also make charitable donations. However, we do so with no expectation of getting or retaining business for Glatfelter.

If you wish to take part in charitable activities on Company time or using Company assets, contact Human Resources. To maximize the impact of the Company's charitable giving and ensure a consistent and appropriate standard for recipients, direct donations of Company funds require the preapproval of the corporate Human Resources Department.

*Other references: Charitable Giving Process*
Glatfelter’s PEOPLE make every day, but how and where do they fit into the process of making effective decisions? Here is one model that an individual or a team facing a complex decision can use.

**DEFINE** the actual problem that needs solving.
- How would people in other Glatfelter positions or departments see the problem?
- Does the problem impact customers, suppliers, communities, or other stakeholders, and, if so, how would they describe the problem?

How you see the problem will limit how you see the solution. Consider different perspectives.

**LIST** any and all potential solutions or responses to the problem.
- Gather information and look around, inside and outside of the Company, for input. Others may have effectively solved this problem, or one like it, before you.
- Brainstorming is a key to innovation. An incomplete or impractical idea may spark another that turns out to be the best choice.

**EVALUATE** each possible solution or response.
- Is it legal?
- Is there a provision of the Code or Glatfelter’s policies that encourages or prohibits it?
- Does it promote or depart from any of our Core Values?

Alternatives not in keeping with our Core Values, or that are prohibited by this Code or the law, are not the right answer. If you cannot answer the above questions for each viable alternative, check with the Law Department.

**COMMIT** to the best values-based choice and make a decision.
- You may want to discuss your decision process or selected alternatives with others who are impacted, your management, or the Law Department.
- When you are ready, commit to your choice and implement it.
How to Speak Out

We offer the following options for Glatfelter PEOPLE to report concerns or ask questions.

1. The Integrity Helpline

   The Integrity Helpline provides an anonymous, confidential way to report a concern. It is free to use and is available 24 hours a day, seven days a week, in multiple languages.

   To use the Integrity Helpline, simply call the appropriate number below. The Integrity Helpline is operated by an independent service provider, and calls are not recorded or traced.

   The Integrity Helpline service center will notify the Glatfelter compliance staff of the call. You will be given a reference number and advised when to call back to inquire about the status or resolution of the matter.

<table>
<thead>
<tr>
<th>Country</th>
<th>Phone Number</th>
<th>Mobile Phone Access</th>
<th>Languages Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>800-346-1676</td>
<td>Yes</td>
<td>Canadian, English</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>German, Spanish, Russian</td>
</tr>
<tr>
<td>China</td>
<td>10-800-110-0545 or 10-800-711-0564</td>
<td>No</td>
<td>Cantonese, Mandarin, English</td>
</tr>
<tr>
<td>France</td>
<td>0800-91-1518</td>
<td>Yes</td>
<td>French, English</td>
</tr>
<tr>
<td>Germany</td>
<td>0800-082-1050</td>
<td>No</td>
<td>German, English</td>
</tr>
<tr>
<td>Philippines</td>
<td>1-800-111-0100</td>
<td>Limited</td>
<td>Tagalog, English</td>
</tr>
<tr>
<td>Russia</td>
<td>9 8 10 1 800-346-1676</td>
<td>Limited</td>
<td>Russian, English, Spanish, German</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>0800-587-1477</td>
<td>Yes</td>
<td>English</td>
</tr>
<tr>
<td>United States</td>
<td>800-346-1676</td>
<td>Yes</td>
<td>English, Canadian, French, German, Russian</td>
</tr>
</tbody>
</table>

2. Chief Compliance Officer/Law Department

   By e-mail at GeneralCounsel@glatfelter.com
   By phone at + 01 717-225-2066 (from outside the USA, dial the appropriate country code)

3. Board of Directors’ Audit Committee Chair

   By e-mail at Audit_Committee_Chair@glatfelter.com

4. Any senior leader of the Human Resources Department

5. Your manager or supervisor

* This Acknowledgment must be signed, dated, and returned to your supervisor or Glatfelter contact person no later than five (5) business days after your receipt of the Code of Business Conduct.

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