



Glatfelter Supplier Code of Conduct

AT GLATFELTER, WE ARE KNOWN BY WHAT WE DO AND HOW WE DO IT. We have earned a strong reputation as a global leader in our industry through consistent application of ethical business practices. We conduct business in line with our Core Values of Integrity, Mutual Respect, Financial Discipline, Customer Focus, and Environmental and Social Responsibility. Glatfelter has created this Supplier Code of Conduct ("**Code**") to make our global expectations for our business partners clear with respect to how they conduct business with us and on our behalf. All suppliers, vendors, contractors, consultants, agents or any other provider of goods or services to Glatfelter and its affiliated companies (including their employees, agents, representatives and contractors) ("**Suppliers**"), are expected to comply with this Code.

- 1. COMPLIANCE WITH LAWS.** Suppliers shall comply with all applicable laws, statutes, ordinances, regulations, rules and pronouncements wherever they are doing business for or with Glatfelter.
- 2. ANTI-CORRUPTION AND FAIR COMPETITION.** Suppliers must compete fairly for Glatfelter's business without violating any anti-bribery or corruption laws. Payment of bribes, receipt of kickbacks or giving anything of value to government officials, customers, suppliers or other third parties to obtain a personal benefit or competitive advantage is strictly prohibited. Suppliers must disclose all potential conflicts of interest, including those where an officer, employee, or agent of Glatfelter has a personal interest of any kind in the business relationship between Glatfelter and the Supplier, as well as where there is a link to a public or governmental institution or politically exposed person.
- 3. GIFTS/ENTERTAINMENT.** Suppliers are prohibited from providing or offering gifts or entertainment to Glatfelter employees or representatives that could inappropriately influence Glatfelter's business decisions or gain an unfair advantage.
- 4. ACCURATE FINANCES AND INVOICES.** Suppliers shall maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting principles. All invoices provided by Suppliers to Glatfelter shall be detailed, itemized and accurate in all respects.
- 5. TRADE COMPLIANCE.** Suppliers shall comply with all applicable international trade and compliance laws and regulations while shipping or transporting any product in relation to Glatfelter.
- 6. HUMAN RIGHTS.** Glatfelter believes that respect for human rights and ethical business conduct are fundamental to doing sustainable, socially responsible business throughout the world. Suppliers shall respect human rights as expressed in the United Nations Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.
- 7. LABOR/EMPLOYMENT LAWS.** Suppliers must follow all applicable labor, wage and hour laws, including those governing minimum wages, payment of overtime and maximum work hours. Suppliers may not use any forced labor or exploitative working conditions. Based on the child and forced labor principles of the International Labor Organization conventions, Suppliers are expected to restrict employment to those aged 15 or older or the local minimum employment age or the mandatory school age, whichever is higher. Forced labor, including bondage and indentured servitude is strictly prohibited. The use of prison workers is not allowed, unless the prisoners freely consent to work and there is no threat or implication of any penalty if a prisoner refuses the work offered.
- 8. RESPECT IN THE WORKPLACE.** Suppliers shall encourage a diverse workforce and provide a workplace free from illegal discrimination, harassment, hostility, intimidation, bullying or any other abusive behavior.



- 9. HEALTH AND SAFETY.** Suppliers shall provide clean and safe working environments and conditions for all their employees and shall abide by their respective countries' safety laws and regulations. Suppliers shall provide their employees appropriate safety training, including an emergency preparedness plan and well-maintained personal protective equipment.
- 10. ENVIRONMENTAL PROTECTION.** Suppliers shall uphold all environmental laws, rules and regulations. Suppliers shall focus on developing and implementing environmentally sustainable business practices. All environmental permits shall be up to date. Waste and hazardous materials are to be properly handled, labeled, stored and disposed. Suppliers must promptly report allegations of environmental harm received from governmental authorities to Glatfelter.
- 11. CONFIDENTIALITY/DATA PRIVACY.** Suppliers are expected to keep confidential any Glatfelter non-public, confidential or proprietary information disclosed by Glatfelter while doing business. Suppliers shall also abide by all applicable laws concerning data privacy and protection.
- 12. AUDITING.** Suppliers will allow Glatfelter and/or third-party representatives, retained by or representing Glatfelter (collectively, the "Auditor"), to assess Supplier's compliance with the Supplier Code of Conduct by inspecting Supplier's facilities during normal business hours and reviewing Supplier's practices, policies, and relevant records. Supplier shall further allow the Auditor to interview Supplier's personnel without monitoring, solely to verify Seller's compliance with the Supplier Code of Conduct. Supplier shall not request or encourage Supplier's personnel to furnish false or incomplete information to the Auditor during such interviews and shall not take retaliatory action against Supplier's personnel interviewed.
- 13. REPORTING VIOLATIONS.** Suppliers must record and monitor its practices to ensure all aspects of this Code are being upheld. Any violations of this Code must be reported immediately to Glatfelter. Suppliers may also report suspected violations via Glatfelter's Integrity Helpline on a 24/7 basis on the Internet at glatfelter.navexone.com or by phone at 1-800-346-1676 in the USA or to other dedicated phone lines in other countries throughout the world where Glatfelter has operations or offices. A list of international phone lines is provided on Glatfelter's website at www.glatfelter.com. Reports to the Integrity Helpline may be made anonymously.
- 14. CONSEQUENCES.** Glatfelter has confidence that its Suppliers will adhere to the terms and conditions of this Code and actively do their utmost to achieve its standards. In case of a violation of this Code, Glatfelter shall be entitled to suspend or terminate any contract and business relations with the Supplier with immediate effect and reserves the right to bring further legal action at its discretion.

READ, ACKNOWLEDGED, AND AGREED:

Place / Date

Company Name

Signature

Printed Name

Signatory Title