

# ANTI-BRIBERY POLICY

## POLICY

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Weyerhaeuser is committed to conducting its business with integrity. We obey the law in all countries where we do business, including anti-bribery laws such as the United States Foreign Corrupt Practices Act, the Canada Corruption of Foreign Public Officials Act, and the UK Bribery Act.

We do not directly or indirectly solicit or accept, or offer, promise, authorize or give, bribes or other improper payments from or to anyone.

Under this policy:

- **“bribe”** means, directly or indirectly, offering, giving or receiving money, gifts or anything of value to influence someone to do something that is improper, in violation of his or her duty or illegal, or to secure an improper advantage
- **“improper payments”** includes bribes, kickbacks, excessive gifts or entertainment, or anything of value improperly offered, given or received
- **“anything of value”** means any form of benefit, and includes, but is not limited to, cash, gifts, entertainment, donations, services, or discounts
- **“government official”** means
  - any official or employee of a government or any of its departments or agencies, regardless of rank (for example, officials in customs, tax, immigration, police, and agencies that issue permits, approvals or licenses)
  - any person acting in an official capacity on behalf of a government or any of its departments or agencies (for example, a procurement or environmental consultant)
  - any director, officer or employee of a company or business that is owned in whole or in part by a government or any of its departments or agencies (for example, an airline or utility)
  - any director, officer or employee of a public international organization, such as the World Bank or United Nations
  - any candidate for political office and any political party or any official of a political party

Dealings with certain government officials may be subject to stricter requirements. For additional guidance, see Weyerhaeuser's Political & Government Affairs Policy.

This policy also prohibits:

- use of funds for any unlawful purpose
- any undisclosed or unrecorded transactions
- any payments other than for their intended purpose

This policy applies to all business activities anywhere in the world, whether they involve government officials or private commercial activities. This policy applies to all of our employees. Also, our expectation is that all third parties who provide services to us or act on our behalf, such as agents, sales representatives, distributors, consultants, suppliers, and other business partners, will comply with this policy.

All of our employees are expected to know and comply with this policy. Senior leaders and employees who may deal with foreign government officials are expected to participate in anti-bribery training on a regular basis. Third parties who provide services to us or act on our behalf and who may deal with foreign government officials are also expected to participate in anti-bribery training on a regular basis.

Leaders' responsibilities include:

- provide guidance to employees to ensure compliance with this policy
- ensure that appropriate employees and third parties complete anti-bribery training on a regular basis
- conduct due diligence where appropriate before engaging third parties or investing in any entity
- participate in the company's certificate of compliance process which communicates and reaffirms compliance with this policy and identifies concerns
- consult with the company's Law & Corporate Affairs, Ethics and Business Conduct, or Internal Audit departments, as appropriate

Any employee who is aware of a practice or transaction of concern under this policy should report it to his or her manager. Reports may also be made by telephone using the Weyerhaeuser EthicsLine at 1-800-716-3488 or online using Weyerhaeuser EthicsOnline at [www.WeyerhaeuserEthicsOnline.com](http://www.WeyerhaeuserEthicsOnline.com). Any such report will be treated as confidential to the extent allowed by law. Reports may also be made anonymously. Weyerhaeuser prohibits retaliation for good faith reports of suspected misconduct.

Compliance with this policy requires strict observance of the following standards:

In this area...	Our standard is to...
Use of Company Funds	Not use funds for any purpose which would be in violation of any law or regulation of any applicable country.
Company Records	<p>Accurately and fairly record all payments, transactions and dispositions of assets in the company's books, records and accounts.</p> <p>Maintain a system of internal accounting controls sufficient to provide adequate corporate supervision over all accounting and reporting activities.</p> <p>Not make or authorize false, inaccurate, misleading or incomplete entries, create any "off-the-book" accounts, or otherwise attempt to circumvent the company's system of internal accounting controls.</p>
Payments	Not directly or indirectly solicit or accept, or offer, promise, authorize or give bribes or other improper payments from or to anyone.
Political Contributions	<p>Obtain approval in advance from the Law &amp; Corporate Affairs Department for all contributions to foreign government officials, political parties, and candidates for political office.</p> <p>Comply with the company's other policies dealing with the public sector, including our Political &amp; Government Affairs Policy.</p>
Third Parties	Do business with third parties that share our commitment to ethical business conduct. To ensure this occurs, we conduct appropriate due diligence, reach written agreement with this policy before engaging third parties, and where appropriate require third parties to take our anti-bribery training.
Foreign Investments	Make no investment in any foreign entity or business without adequate due diligence and written agreement on compliance with this policy.
Facilitation Payments	Not make facilitation payments (also known as "expediting" or "grease" payments), which are small payments or fees to government officials to secure or speed up routine government action. There are very limited exceptions, such as when facilitation payments are officially published by a government agency and available to the general public or in exceptional emergency situations when an employee's personal safety is at risk. In such situations, the facilitation payment should be immediately reported to the Law & Corporate Affairs Department.
Promotional Activities	Allow payments to government officials for the promotion or demonstration of the company's products or services, if proper and lawful under the law of the local country. Such payments must be reasonable in amount and legitimately related to our sales and marketing activities. Examples are courtesy gifts, product samples, and meals, travel and lodging related to a site visit.

## SUPPORTING INFORMATION

Assistance is available from the following resources: (click to follow link)

- Anti-Bribery Training and Compliance Program
- Law & Corporate Affairs Department
- Ethics & Business Conduct
- Internal Audit

## **PENALTIES & CONSEQUENCES**

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Violations of anti-bribery laws can result in both civil and criminal penalties for both the company and individual employees. Individuals may be fined and/or imprisoned as the result of criminal prosecution. In addition, employees violating this policy are subject to disciplinary action, up to and including termination of employment.

## **OWNER**

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Senior Vice President and General Counsel of Weyerhaeuser Company

## **APPROVAL**

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Original Approval:	August 11, 1998
Amended:	December 23, 1998
	November 20, 2007
	December 7, 2010
	November 19, 2014