

WEYERHAEUSER

# SUPPLIER CODE OF ETHICS





# A MESSAGE TO OUR VALUED SUPPLIERS

Weyerhaeuser Company and its affiliates and subsidiaries (collectively, “Weyerhaeuser,” “we,” or “us”) are committed to sustainable forest management, environmental responsibility, safeguarding human rights, and responsible corporate governance, including maintaining the highest standards of ethical conduct and complying with all applicable federal, provincial, state, and local laws and regulations (collectively, “laws”).

Weyerhaeuser strives to select and work with suppliers that maintain a commitment to these strong ethical standards. This Weyerhaeuser Supplier Code of Ethics (“Code”) provides a foundation for Weyerhaeuser and its suppliers to build and maintain relationships based on fairness, trust, respect for the rights of individuals, compliance with Laws, and sustainable business practices.

This Code outlines Weyerhaeuser’s expectations and requirements regarding the business practices of suppliers and contractors providing products and services to Weyerhaeuser, along with their parent entities, subsidiaries, affiliates, subcontractors and other representatives that are within their supply chains (collectively, “supplier” or “you”). The expectations and requirements contained in this Code are essential to our decision whether to enter into or extend existing business relationships. Weyerhaeuser may opt to terminate its relationship with suppliers that violate this Code. Each supplier is responsible for ensuring that its employees, representatives and subcontractors understand and comply with this Code.

## COMPLIANCE WITH LAWS AND REGULATIONS

Weyerhaeuser is committed to compliance with the law wherever it conducts business. We require suppliers to comply with all applicable laws, including laws relating to employment, anti-bribery, antitrust, human rights, trade, the environment, and health and safety, in addition to other topics included in this Code. We reserve the right to decline to deal with suppliers that do not comply with the laws or the standards outlined in this Code.

## EQUAL EMPLOYMENT PRACTICES AND HUMAN RIGHTS

Weyerhaeuser uses fair employment practices and strives to provide a safe and productive work environment for its employees. We expect suppliers to also maintain fair employment practices, including:

### NON-DISCRIMINATION AND HARASSMENT

Suppliers must comply with all applicable laws relating to employment practices. We expect suppliers to operate their workplaces free of discrimination, harassment, retaliation and similar abuse on any grounds including, but not limited to, the basis of sex, gender, race (including traits historically associated with race, such as hair texture and protective hairstyles), color, religion, national or ethnic origin, ancestry, citizenship status, age, physical or mental disability, sexual orientation, gender identity or expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be



transitioning to the gender with which they identify), genetic information, military or veteran status, marital status (including domestic partnership status), pregnancy (including childbirth, lactation, and related medical conditions), or any other characteristic protected by applicable Law. Suppliers must not tolerate harassment, bullying or any other inappropriate workplace conduct.

### RESPECT FOR HUMAN RIGHTS

Weyerhaeuser is guided by the United Nations Universal Declaration of Human Rights, the International Labor Organization Labour Standards, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Declaration on the Rights of Indigenous Peoples. We strive to adhere to the principles set forth in these standards, and we expect suppliers to abide by laws and treaties pertaining to human rights in all jurisdictions where they operate, including:

- ▶ **Commitment to fair working conditions:** Suppliers must adhere to all relevant and applicable human rights and labor laws, including those related to maximum hours of daily labor (wage, overtime and other maximum hour laws), rates of pay, and fair working conditions.

► **Prevention of modern slavery and human trafficking:** Weyerhaeuser does not tolerate slavery, forced labor, bonded labor, coerced prison labor, or human trafficking in any form. Weyerhaeuser requires suppliers to fully comply with all applicable slavery, forced labor, and human trafficking laws (in all jurisdictions where suppliers operate, such as the UK Modern Slavery Act 2015, California Transparency in Supply Chains Act, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act), and expects suppliers to enact practices to ensure compliance with such laws, and to report any incidents of possible violations to the [Weyerhaeuser Ethics & Compliance](#) function or through the reporting resources provided below.

► **Prohibition on the use of child labor:** Weyerhaeuser does not tolerate child or underage labor in any form. Suppliers must act in compliance with all applicable laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships and internships of youths and students.

► **Freedom of association and right of collective bargaining:** Suppliers must respect the right of employees to freely organize and bargain collectively, including to openly communicate and share concerns regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment. In alignment with these principles, suppliers must respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, and respect the right of workers to refrain from such activities.

## RESPONSIBLE SOURCING

Suppliers are expected to design due diligence systems to track and monitor human rights risks and associated environmental risks linked to the extraction, transport and use of all raw materials and third-party goods. These systems should include appropriate risk identification, mitigation, monitoring, remediation and reporting mechanisms. Suppliers are required to report to Weyerhaeuser any incidents that may violate this provision of the Code (see the section on Reporting Concerns, below).

## HEALTH AND SAFETY

Safety is a core value at Weyerhaeuser, and we expect suppliers to prioritize and demonstrate a commitment to safety.

### We require suppliers to:

- Adhere to all applicable laws governing safety and health practices, such as the Occupational Safety and Health Acts (U.S. and Canada) and similar federal, provincial and state laws and regulations.
- Conduct themselves in a manner consistent with all applicable safety standards, including governmental, Weyerhaeuser site-specific, and contractual requirements applicable to safety plans.
- Make continuous efforts to achieve a workplace that is free from work-related injury and illness.
- Provide their employees with a safe and healthy work environment, including access

to clean and safe working conditions and a workplace free of the effects of alcohol and drug use.

- ▶ Identify and respond to any public health impacts of their operations and the use of their products and services.
- ▶ Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- ▶ Provide Weyerhaeuser with all required data on recordable injuries or fatalities that occur at a Weyerhaeuser location as well as their total recordable incident rate.

All supplier employees have the right to refuse work and are required to report health and safety concerns on Weyerhaeuser premises by reporting them to Weyerhaeuser's site safety teams.



## SUSTAINABILITY AND ENVIRONMENTAL COMPLIANCE

Weyerhaeuser strives to do business with suppliers that share our concerns for and commitment to sustainable business practices. At a minimum, suppliers must comply with all applicable environmental laws in the countries where they do business. In addition, we will seek business relationships with suppliers that consistently look for new and better ways to conserve resources, reduce pollution and waste, and enhance the communities in which they operate.

Weyerhaeuser expects suppliers to also comply with forest best management practices adopted by Weyerhaeuser to prevent environmental incidents. Suppliers' employees have the right to report environmental compliance concerns on Weyerhaeuser premises to the company's environmental compliance resources or to the Weyerhaeuser Ethics Helpline at the link provided below.

## CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Weyerhaeuser requires its suppliers to comply with all applicable laws and any contractual obligations governing the proprietary or confidential information and data of Weyerhaeuser and other third parties, and to protect such items from misuse. Suppliers with access to Weyerhaeuser's confidential information must not disclose such information to other parties without Weyerhaeuser's written consent. We require suppliers to make every effort to safeguard confidential

information against unauthorized disclosure and immediately report unauthorized disclosures to Weyerhaeuser.

Confidential information may include, but is not limited to, the following business and technical information:

- Pricing and rebate programs
- Customer lists and contacts
- Supplier lists and costs
- Market studies
- Business forecasts and strategies
- Forms and financial models
- Contract terms and conditions
- Ideas, formulas and recipes
- New products and processes
- Engineering plans, designs, diagrams, drawings or blueprints
- Manufacturing operating parameters
- Software and source codes
- Scientific data and research results

Similarly, we expect that suppliers will respect the intellectual property rights of Weyerhaeuser and others and handle any such intellectual property in accordance with applicable laws and its contractual obligations. Suppliers must ensure that the products and services provided to Weyerhaeuser do not violate the patent, trademark, copyright or other proprietary rights of any third party.



## PRIVACY AND DATA PROTECTION

Weyerhaeuser is committed to compliance with all applicable laws regarding privacy in all countries in which we operate, and we expect our suppliers to meet these requirements in all jurisdictions where they operate, store, transfer or use Weyerhaeuser data. Many privacy laws, such as the California Consumer Privacy Act, the Canadian Personal Information Protection and Electronic Documents Act, or the E.U. General Data Protection Regulation, regulate personal data, which includes any information or a combination of data that identifies a unique individual, such as name, personnel number, email address, IP address, home address, date of birth, or other identifiers. While conducting business with Weyerhaeuser, it may be necessary for suppliers to collect, access, use, process, transfer, disclose, manage or store personal data of Weyerhaeuser employees, customers or other stakeholders. Suppliers must comply with all applicable data privacy and security laws and ensure that personal data is only processed for legitimate business purposes consistent with the purposes for which the data was initially collected. Suppliers should seek guidance from the [Weyerhaeuser Privacy team](#) if they have any questions or concerns about Weyerhaeuser's expectations for handling personal data.

When suppliers handle any Weyerhaeuser data (whether personal information or otherwise) in the performance of services on our behalf, we require them to ensure that such information is protected against unauthorized disclosure and is appropriately safeguarded. Suppliers must implement processes to identify and manage

emerging and evolving cybersecurity risks, including reviews at least annually to prevent, detect and respond to all cybersecurity risks. Suppliers must make best efforts to minimize the risks of cybersecurity incidents that affect the products and/or services provided to Weyerhaeuser and cooperate with any cybersecurity or privacy assessments conducted by Weyerhaeuser.

Suppliers must immediately report actual or possible unauthorized disclosures of any Weyerhaeuser data to [Weyerhaeuser IT Security](#) and any compromise of Weyerhaeuser personal information to the [Weyerhaeuser Privacy team](#) or toll-free at (844) 330-7632.

## INSIDER TRADING

In the course of conducting business with Weyerhaeuser, suppliers may gain access to confidential non-public information about Weyerhaeuser or other publicly traded companies and are required to abide by insider trading laws. An insider may be subject to civil and criminal penalties for engaging in transactions in company securities at a time when they have knowledge of material nonpublic information regarding the company. These penalties include criminal and civil fines, injunctions preventing service as an officer or director of any public company and imprisonment. An insider may be liable for improper transactions by any person to whom they have disclosed material nonpublic information. Suppliers must also not “tip” others about material non-public information. Any information not publicly known that could influence someone’s decision to buy or sell stock or could reasonably be expected to



affect the price of stock is considered inside information. For example, inside information includes non-public financial results, earnings projections, a proposed acquisition or divestiture, a significant new commercial agreement, proposed merger or acquisition, a cybersecurity breach, changes in senior management, or significant new litigation. Violations of such laws could subject suppliers to criminal penalties.

## ANTITRUST AND FAIR COMPETITION

Weyerhaeuser requires suppliers to abide by all applicable antitrust and fair competition laws in all jurisdictions where they operate. Suppliers must not enter into illegal agreements or take actions that unreasonably restrain trade or are deceptive and misleading. Suppliers must never discuss or agree with competitors on prices or other terms of sale, allocation of customers or markets, coordination on the provision of products or services, the allotment of contracts or customer opportunities, any boycott of certain customers or other suppliers, or around coordination or restrictions on hiring employees.

## ANTI-BRIBERY

Weyerhaeuser expects suppliers to do business in an ethical and transparent manner. Suppliers must not offer bribes, kickbacks or improper payments of any kind to government officials or any other person in the private sector for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the Canadian Corruption of Foreign Public Officials Act, and other local anti-bribery laws in each jurisdiction in which they do business.

## CONFLICTS OF INTEREST AND GIFTS AND ENTERTAINMENT

Weyerhaeuser expects suppliers to avoid activities that pose a conflict of interest to its performance to, and/or business relationship with, Weyerhaeuser. Suppliers must disclose actual or perceived conflicts of interest to Weyerhaeuser.

Suppliers must use good judgment when exchanging business courtesies with Weyerhaeuser employees. Gifts, meals, entertainment, hospitality and trips that are lavish or lack transparency or a legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. We discourage giving or accepting gifts or entertainment exceeding nominal values and prohibit the provision of excessive gifts, hospitality, loans or guarantees to or from suppliers. This



applies both to Weyerhaeuser employees and their immediate family members.

**Note:** “Nominal value” denotes an item or event of relatively low value that is unlikely to be perceived as improperly influencing the recipient, such as logoed promotional items or standard business meals.

## TRADE COMPLIANCE

As a global company, Weyerhaeuser is subject to international trade compliance laws and requires suppliers to comply with all laws regarding trade compliance, including:

**Imports:** Customs laws require companies to determine the correct classification, value and country of origin of all of its imports. Suppliers must report the accurate and complete information regarding any imported item, its tariff classification, country of origin and customs value, either to Weyerhaeuser or to the appropriate importing authority in all applicable jurisdictions.

**Exports:** Suppliers are required to abide by all applicable export control laws and will not

provide controlled technologies, products or technical data to Weyerhaeuser without providing notice of such controls as necessary for Weyerhaeuser to maintain compliance with applicable Laws. Suppliers will adhere to all other export requirements applicable to their goods and services.

**Anti-Boycott:** Weyerhaeuser requires all suppliers to abide by U.S. anti-boycott laws. A boycott occurs when a party abstains from or enters an agreement to abstain from doing business with other individuals or countries, such as the Arab League boycott of Israel. The U.S. prohibits U.S. parties from participation in such boycotts and maintains mandatory reporting laws pertaining to illegal boycott requests. Weyerhaeuser expects all suppliers to immediately report any illegal boycott requests to Weyerhaeuser and cooperate with any mandatory reporting requirements.

**Economic Sanctions:** Economic sanctions regulate where and with whom we can do business. The U.S., Canada, the E.U., the U.N. and other governmental authorities prohibit transactions with certain countries, persons or entities that have violated export-related Laws or are believed to pose a threat to national security. Weyerhaeuser must abide by all applicable economic sanctions or trade embargoes and expects its suppliers to prevent conducting any business with sanctioned countries or denied or blocked parties. Suppliers are also expected to cooperate with inquiries from Weyerhaeuser related to the ultimate destination and use of Weyerhaeuser goods, as well as the true origin of goods procured by Weyerhaeuser's purchasing or supply chain functions.

## REPORTING CONCERNS

Suppliers may contact Weyerhaeuser with any questions and should promptly report violations of this Code or any unethical behavior by a Weyerhaeuser employee to a Weyerhaeuser manager or, if that is not feasible, to Weyerhaeuser Ethics & Compliance through one of the following means:

Email: [ethics@weyerhaeuser.com](mailto:ethics@weyerhaeuser.com)

EthicsLine Phone Operators: (800) 716-3488

EthicsOnline Web-Portal:

[www.WeyerhaeuserEthicsOnline.com](http://www.WeyerhaeuserEthicsOnline.com)

Except as required by law, persons reporting concerns may request that they remain anonymous. Weyerhaeuser Ethics & Compliance makes every attempt to protect the confidentiality of information provided to it, unless maintaining confidentiality would create a significant health, safety or legal risk. Weyerhaeuser's Ethics Helpline resources are available 24 hours a day, seven days a week. Weyerhaeuser policies prohibit any retaliation or reprisal for reporting information about a possible violation or concern in good faith.

