

ND PAPER SUPPLIER CODE OF ETHICS

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INTRODUCTION

At ND Paper, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Our Supplier Code of Ethics sets out our expectations for suppliers in the areas of business integrity and anticorruption, labor practices, health and safety, and environmental management.

All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with or on behalf of ND Paper are expected to follow our Supplier Code of Ethics and all other relevant policies as a condition of doing business with ND Paper. Suppliers are also expected to communicate and apply the Supplier Code of Ethics and relevant policies throughout their supply chain.

LABOR

Health, Safety & Security

ND Paper is deeply committed to the health, safety, and security of its employees. Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they have operations and businesses.

Because suppliers often work directly alongside ND Paper employees, ND Paper suppliers are expected to take all appropriate measures to verify employees' backgrounds and qualifications before employment. In addition, ND Paper suppliers shall proactively manage health and safety risks within their operations and while onsite at ND Paper locationsto provide an incident-free environment where occupational injuries and illnesses are prevented.

Non-Discrimination & Anti-Harassment

Suppliers must not discriminate in hiring, promotion, salary, or any other terms or conditions of employment, against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sex (including pregnancy), sexual orientation, gender identity, marital status, ancestry, or any other status protected by law. Suppliers must not threaten workers with, nor subject them to, harsh or inhumane treatment, including but not limited to verbal abuse, mental or physical coercion, and sexual harassment.

Human Rights

Suppliers must follow applicable law on human rights, human trafficking, and slavery. A supplier's failure to abide by such laws protecting human rights will be considered a material breach of the supplier's obligations to ND Papery, thereby permitting ND Paper to take all lawful actions against the supplier permitted by the agreement and local law.

Use of Subcontractors

ND Paper appreciates that in today's business environment, suppliers may have reason to subcontract certain aspects of their service delivery. To become a ND Paper supplier, you must pass through a competitive procurement process, which may include rigorous due diligence of your business. Suppliers who wish to delegate services to subcontractors will be expected to maintain the same level of excellence ND Paper expects to receive from its suppliers.

- All suppliers must notify ND Paper in writing should the use of a subcontractor be deemed necessary for the completion of work as well as disclose the subcontractors used.
- ND Paper reserves the right for final approval on any subcontractors used for ND Paper business.
- ND Paper reserves the right to review the subcontractor POs and invoices if any subcontractors are used.

Maintenance of Accurate Records

We expect our suppliers to maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices, including with respect to all invoices submitted to ND Paper for payment or reimbursement.

ENVIRONMENT

Environmental Compliance

Environmentally responsible production is at the core of who we are as ND Paper. Suppliers must develop, implement, and maintain environmentally responsible business practices, abiding by all federal, state, and local environmental laws.

BUSINESS ETHICS

Anti-Bribery & Anti-Corruption

Suppliers must not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper business advantage, such as paying or offering anything of value to any ND Paper employees or affiliates with the intent to improperly influence such person's business decision making or to secure some other improper business advantage.

ND Paper expects all suppliers to abide by all applicable anti-corruption laws and regulations of the countries in which it operates.

Bribery of federal, state, or local public officials in any country is illegal and strictly prohibited. It is absolutely prohibited to give, offer or promise, directly or indirectly, anything of value to or for the benefit of any public official with the intent to influence any public act or to influence any public official to commit or aid in the commission of any act in violation of the law.

Gifts & Business Courtesies

ND Paper maintains a strict zero-gift policy, even when gifts may be permissible under local law and policy. ND Paper will never extend preferential treatment to suppliers because of their offer of gifts, entertainment, or other items of value. Suppliers may not offer gifts to ND Paper in an attempt to improperly influence our business decisions, or to improperly gain advantage over other suppliers.

Intellectual Property & Confidentiality

Suppliers must protect ND Paper's intellectual property and maintain the confidentiality of ND Paper trade secrets and non-public information.

Suppliers should take proper care to protect all sensitive information, including confidential, proprietary, and personal information of their customers including ND Paper. Information received by suppliers should not be used for any purposes beyond the scope of the business arrangement with our company without prior authorization.

Conflicts of Interest

Suppliers should disclose to ND Paper any actual or potential conflicts of interest in doing business with ND Paper, including any relationships (familial or otherwise) between a Supplier's employees, or otherwise affiliated persons, and ND Paper employees that make decisions affecting the Supplier's business with ND Paper.

Anti-Trust

Suppliers must not enter agreements or take actions that unreasonably restrain trade or are deceptive and misleading to the marketplace.

No Retaliation

ND Paper has a strict no-retaliation policy with regards to the good-faith reporting of potential legal or ethical issues. ND Paper will not tolerate or condone retaliatory actions taken against any supplier employee or agent in response to the good faith reporting of such issues. ND Paper reserves the right to take any action deemed necessary, including the potential termination of the business relationship with any supplier who engages in such conduct.

Reporting Violations

Suppliers and ND Paper employees are obligated to report incidents or transactions in violation of the Supplier Code of Ethics to ND Paper Corporate Sourcing and Internal Audit (contact information below).

Thadd Stankowski, General Counsel

Email: Legal@us.ndpaper.com

Forrest Aven, Management Controller

Email: Forrest.Aven@us.ndpaper.com

SUPPLIER SIGNATURE

An authorized signatory of the Supplier understands and confirms that the Supplier Company complies with the ND Paper Supplier Code of Ethics.

Supplier Company Name: _____

Supplier Contact Name: _____

Signature: _____

Date: _____