

International Paper Company

Lobbying, Political Donations and Activities Policy

Amended and Restated as of February 11, 2025

Overview

International Paper Company (the “Company” or “International Paper”) actively participates in the political process by advocating on behalf of the Company on issues impacting our business and industry.

It is International Paper’s policy to obey all global laws that govern our lobbying activities and political donations in all regions. This Lobbying, Political Donations and Activities Policy (the “Policy”) should be read in conjunction with the *Political Activities* policy in the [International Paper Code of Conduct](#).

Lobbying

Our government relations team is led by our Vice President of Global Government Relations and is responsible for advancing the Company’s interests and liaises with policymakers in the U.S., Mexico and the EU. The team actively participates in the political process with the ultimate goal of promoting and protecting the economic future of the Company, our shareowners, and employees.

Examples of issues of importance to the Company include sustainable manufacturing, climate, recycling, combatting illegal logging, deforestation, minimizing the Company’s tax burden and securing incentives, and safety.

IP complies with all lobbying laws including the Lobbying Disclosure Act and the Honest Leadership and Open Government Act in the U.S., which require reporting on lobbying activities and related expenses. Individuals who engage in lobbying activities on behalf of IP are required to report such activities and any related expenditures to the Global Ethics and Compliance Office. Lobbying activities by IP employees must be reported in the same quarter in which the activity occurred.

Trade Associations

International Paper invests in groups and coalitions that advance the Company’s policies and priorities through associations and third parties. The Company carefully weighs the benefits and obligations of any organization or association before joining. The Company also monitors its involvement to ensure that its interests are properly represented and that the resources International Paper commits are used wisely.

Our policy positions are generally consistent with the trade associations, coalitions and other organizations in which we participate. IP consistently seeks to inform and advocate our views on issues within organizations. Given the variety of business issues in which many associations and other groups are engaged, International Paper does not necessarily agree with all positions taken by every organization in which it is a member. We believe membership and engagement with trade associations, coalitions and other groups is critical for sharing industry

best practices, research, and data analysis which drives collaborative action and process improvement. If an organization or association takes policy positions contrary to those of the Company, International Paper actively advocates its point of view by working from within the organization.

Political Donations

Corporations are prohibited by U.S. law from making political contributions to any candidate for federal office. International Paper complies with all federal laws and related regulations regarding the use of corporate resources in connection with federal elections. International Paper does not use company funds to make political donations outside the United States. Within the United States, it does not contribute to U.S. federal candidates, federal campaigns or national political parties. Where allowed by law, International Paper may make political donations in the United States at the state or local level. All contributions made by International Paper promote the interests of the company and are made without regard for the private political preferences of any Company employee or officer. The Vice President of Global Government Relations is authorized to make decisions related to giving company resources to candidates, parties, campaigns or committees to ensure compliance with International Paper's Political Donations and Activities Policy.

The Company reports all such contributions in accordance with applicable law.

International Paper Political Action Committee ("IP-PAC")

IP-PAC is a non-partisan political action committee comprised of voluntary donations by eligible employees as defined by the Federal Election Commission. IP-PAC makes political contributions to U.S.-based candidates and campaigns that are in general agreement with the business goals of the Company. All operations of the IP-PAC conform to Federal Election Commission regulations and applicable state laws.

The IP-PAC is governed by a board of directors comprised of IP employees. All IP-PAC funding decisions are made by the IP-PAC board of directors. IP-PAC supports candidates and campaigns that the IP-PAC board believes are in the best interest of the Company who meet the following criteria:

- Support the forest products industry and manufacturing sector
- Have a position and voting record of support for issues that directly concern IP
- Their constituency and electoral district encompasses IP employees, facilities or resources
- They have leadership positions or the potential for leadership positions in the legislature or serve on key legislative committees

All IP-PAC activity is regularly reported to the [Federal Election Commission](#) and applicable states.

Employee Participation

International Paper supports participation by its employees in the political processes of their communities, states and countries. However, no employee may use company resources for private political participation. Our employees must report to the Global Ethics and Compliance Office if they intend to run for office. Employees that engage in lobbying activities must report

such activities and any related expenditures to the Global Ethics and Compliance Office. Any employee who is involved in political activities, and is unsure how those activities fit in with the company's expectations, should consult the Global Ethics and Compliance Office for direction. Employees who become aware of any actual, suspected or potential violations of this Policy or any law governing political donations or political activities must report the violation to an immediate supervisor, the Legal department, the Global Ethics and Compliance Office, or the HelpLine.

Compliance and Oversight

Management is responsible for implementing effective reporting and compliance procedures designed to ensure International Paper's political activities are conducted and disclosed in accordance with applicable laws and Company policy. Management is responsible for monitoring the effectiveness of the political activities undertaken by significant trade associations where IP is a member.

The Public Policy and Environment (the "PPE") Committee of the Board of Directors assists the Company in its oversight of the Company's political activities and expenditures. The Vice President of Global Government Relations reports annually on activities of the Company's government relations team and political action committee to the PPE Committee. The Committee periodically reviews and discusses this Policy with management, and approves any material changes to this Policy. The PPE Committee regularly reports to the Board of Directors.

Disclosure

This Policy shall be published on the Company's website at [Governance Documents | International Paper](#).

We also voluntarily disclose certain trade association memberships on the Company's website at [Governance Documents | International Paper](#). Our voluntary reports of political contributions are published twice a year. Our voluntary reports detail trade associations that received \$25,000 or more in membership dues in a given year and also includes information on the Company's support of nonprofit organizations, ballot measures and corporate political contributions.

Since 2016, IP's voluntary reports of political contributions has earned the Company the designation of CPA-Zicklin Index Trendsetter by the Center for Political Accountability. The CPA-Zicklin Index publishes an annual Corporate Political Disclosure and Accountability report that measures political transparency and oversight practices of the S&P 500. We are one of 100 trendsetter companies to receive a top ranking for political disclosure and accountability due to our voluntary reporting efforts.

Amendments to the Policy

Material amendments to the Policy must be approved by the PPE Committee.