



Domtar

Code of Ethics & Business Conduct

Because We Care

Table Of Contents

- 2** Our Mission/Vision/Values
- 2** Why do we have a Code?
- 3** Application of the Code
- 3** Share Your Concerns
- 4** Responding to Improper Conduct
- 5** We Comply with Laws, Regulations and Rules
 - 5 Trade Bans, Economic Sanctions and Embargoes
 - 5 Import and Export Controls
 - 5 Boycotts
- 6** We Deal Fairly
 - 7 Fair and Transparent Dealings with Suppliers
 - 7 Business Conduct Standards for Suppliers
- 8** We do Not Tolerate Bribery nor Corruption
 - 8 Charitable Contributions
 - 8 Dealing with Agents
- 9** We Avoid Conflicts of Interest
- 10** We do Not Speak on Behalf of Domtar
- 11** We do Not Trade on Inside Information
- 12** We Safeguard Company Assets
- 13** We Protect Non-Public Information
- 14** We Maintain Accurate Records
- 15** We Care About Health and Safety
- 16** We Promote Diversity and Inclusion and we do Not Tolerate Discrimination or Harassment
- 17** We Conduct Business in a Sustainable Way
- 18** We Follow Privacy Laws
- 19** We Respect Human Rights
- 20** One Last Thing
- 21** Resources



Dear colleagues,

Domtar is a company rooted in our values. We strive to foster a work environment that puts a premium on agility, caring and innovation. These shared values are at the very heart of our success.

The members of our Management Committee have as a preeminent goal to foster a strong organizational culture of institutional and individual integrity, compliance, accountability and ethics, while benefitting from the inclusion of diverse ideas and points of view.

Now that Domtar is a privately-owned company, it remains important to have a common way of dealing with issues that arise in order to ensure that our behavior is beyond reproach. We cannot emphasize enough the importance of this last point. Every day, what we do and what we say shapes Domtar's reputation and impacts our common future.

Our Code of Business Conduct and Ethics is aimed at setting the parameters to comply with laws and regulations in all the countries where we conduct business and properly guide our actions. In many instances, Domtar, as a responsible corporate citizen, has adopted policies and best practices that go beyond what the law requires and expects that all of us act accordingly.

Our Code is a valuable guide to ethical issues that may arise from time to time in our contacts with colleagues, sister companies, customers, suppliers, competitors and the general public. Make sure that you understand your responsibilities under the Code and think about how it applies to you and to your work.

Your Management Committee



John D. Williams



Steve Henry



Daniel Buron



Bill Edwards



Nancy Klembus



Peter Martin



Rick McAtee



Rob Melton

OUR MISSION

As a world-class industry leader we deliver the highest value to our customers, empower our employees to excel, and positively impact our communities.

OUR VISION

To be the leader in innovating fiber-based products, technologies, and services; committed to a sustainable and better future.

OUR VALUES

Agility

The world we live in is constantly changing and when we need to adapt, we do it. We are doers, not talkers. We're always looking for simpler, more efficient ways to work. And when we act, we act thoughtfully and benefit from the inclusion of diverse ideas and points of view. We empower our people to make decisions to benefit our company, customers, and communities.

Caring

The people of Domtar welcome and care for each other. We embrace diversity and treat each other with compassion and respect. We look out for each other's safety as well as our own and treat environmental stewardship as a sacred trust. We care deeply for our customers and invest ourselves fully in their success. We are woven into the fabric of our communities. Our caring deepens when we seek a broader understanding of the world.

Innovation

We always look to the future beyond the horizon. Our innovation flourishes when diverse perspectives and imaginations come together through collaboration. We're never satisfied with things as they are and always want to make them better. We bring our resourcefulness and creativity to bear for long-term success. We relish challenges of all kinds and never rest until we've solved them.

WHY DO WE HAVE A CODE?

As a world-class industry leader, we deliver the highest value to our customers, empower our employees to be the best, contribute to the well-being of our communities, and are committed to the highest standards of ethics and business conduct. We believe that the way we do our business is as important as the business that we do. Understanding and practicing the ethical standards outlined in our Code is one of the foundations of our success as an organization and as individual contributors. As the Code is an expression of our core values and a framework for decision-making, each of us has the duty to read, understand and abide by it.



APPLICATION OF THE CODE

The Code applies to all Domtar employees and directors. As Domtar employees, we are expected to read, understand and comply with the Code, ask for help when we are not sure if a decision or considered action is compliant or lawful, report suspected violations, and cooperate with the company's investigation of potential violations. All Domtar managers are expected to lead by example, and promote open and honest communication with their teams, encouraging them to raise their questions and concerns. The Code cannot and is not intended to cover every applicable law, rule or regulation wherever we conduct business around the world, or to provide answers to all questions that may arise. Common sense and good judgment, and doing the "right thing", must govern all our actions. If the right thing to do is not clear, ask yourself:

- **Is it legal?**
- **Is it consistent with our Code and policies?**
- **Does it benefit our company as a whole- not just a certain group or individual?**
- **Would I be comfortable if my actions were made public?**

Everyone is encouraged to seek guidance with respect to, and discuss with supervisors, managers, local human resources personnel, or the Law and Secretariat Department the appropriate course of conduct in a given situation.

SHARE YOUR CONCERNS

No matter what job you do or where you do it, you are Domtar. Think about that as you watch over every business relationship, every transaction and every product, and make sure your actions always reflect our values. Follow our Code and policies as well as the laws and regulations of the country where you work, and protect what we've built. And, complete your assigned training—it's the best way to stay up-to-date on what's expected of you.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead—but misconduct affects all of us. Do not ignore a suspected violation. If you have a concern with, or are aware of, any potentially illegal or unethical behavior, or you believe that an applicable law, rule or regulation or the Code may have been violated, including with respect to Domtar's accounting practices, internal controls or auditing matters, please promptly report the matter. Reach out to the Chief Compliance and Ethics Officer (Senior Vice-President, General Counsel and Corporate Secretary); or use the confidential, third-party operated Ethicspoint Hotline, either on-line or by phone, as indicated in the Whistleblower Protection Policy.

We know it takes courage to come forward and share your concerns. Domtar will not retaliate or permit retaliation against anyone who in good faith raises questions or concerns about corporate activities or makes a report about a possible misconduct. Regardless of who you contact, you can be assured that your concerns will be handled promptly and appropriately, and that the information will only be disclosed to those who need it to resolve the issue.

Additional Resources

- *Ethicspoint Hotline* – <http://www.domtar.ethicspoint.com> or 866-323-3653
- [*Whistleblower Protection Policy*](#)



RESPONDING TO IMPROPER CONDUCT

This Code will be enforced on a uniform basis for everyone, regardless of position within Domtar. Employees who violate the Code will be subject to disciplinary action. Supervisors and managers of a disciplined employee may also be subject to disciplinary action for their failure to properly oversee an employee's conduct, or for retaliation against an employee who reports a violation.

Domtar's response to misconduct will depend upon a number of factors including whether the improper behavior involved illegal conduct. Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in salary or immediate termination. Employees should be aware that certain actions and omissions prohibited by the Code might be crimes that could lead to individual criminal prosecution and, upon conviction, to fines and imprisonment.

For more information and advice on a specific situation, please consult the Human Resources Department, or the Law and Secretariat Department.



We Care About Doing it Right

WE COMPLY WITH LAWS, REGULATIONS AND RULES

What it Means

Above and beyond the strictly legal aspects involved, we act honestly at all times and maintain the highest standards of ethics and business conduct, consistent with Domtar's good reputation as a well-respected corporate citizen. We pursue our business objectives with integrity and in compliance with the law, no matter where we are operating or what is at stake.

What We Do

We fully comply with all applicable laws, regulations and rules affecting Domtar's business and its conduct in business matters that are applicable regardless of the location. Cultural differences or social customs are not an excuse for illegal action.

Trade Bans, Economic Sanctions and Embargoes

We are responsible for knowing and complying with applicable laws, policies and U.S. economic sanctions and trade embargoes restricting international trade.

Import and Export Controls

We must be in compliance with all applicable United States and local export control laws. The United States has controls which restrict the export of certain products, services, technical data and software to other countries, as well as the re-export of those items from one non-United States destination to another.

We must not import or otherwise deal with products or commodities originating from a country subject to United States or local government trade sanctions. We must ensure that all import documentation is accurate and complies with applicable laws and regulations. Where it is Domtar's responsibility to do so, we must ensure that items being imported are correctly described and valued.

If you have questions regarding import and export controls, please contact the Export Compliance Officer for guidance.

Boycotts

We will not participate in boycotts of countries, their nationals or blacklisted companies, unless these boycotts are sanctioned by the United States government and Domtar's participation is approved by the Law and Secretariat Department. We must ensure that we do not enter into an agreement with a third party that contains any term or condition on Domtar to boycott a particular country, group of nationals or specified companies.

Additional Resources

- [*Domtar Corporation Compliance Program*](#)
- [*Export Policy and Export Control Compliance Program*](#)



WE DEAL FAIRLY

What it Means

We believe in free and open competition. We build market share by delivering quality products, not by engaging in unfair or anti-competitive practices.

Everyone may be confronted at some time with pressures, temptations and ethical dilemmas in the workplace. Handling them with integrity – and recognizing when to seek advice – will define your personal contribution to our business. Our success depends on building productive relationships based on honesty, integrity, ethical behavior and mutual trust with each of our customers, suppliers and colleagues.

What We Do

We recognize that in all of the countries where we do business, strict laws are in force prohibiting collusive or unfair business behavior that restricts free competition.

We pursue our business objectives with integrity and in compliance with the law, no matter where we are operating or what is at stake.

We continuously strive to deliver high quality products that meet or exceed our customers' needs and expectations in a manner that does not compromise our ethical and legal obligations.

We foster supplier relationships based on trust, fairness and mutual respect. We hold our suppliers, their employees and subcontractors to the same high standards of business integrity to which we hold ourselves.

We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

Be Agile

Competition Do's and Don'ts

DO:

- ✓ Compete vigorously, but legally
- ✓ Win based on our merits
- ✓ Recognize competition laws are complex. Seek help when in doubt

DON'T:

- ✗ Discuss or enter into agreements with competitors, even informally, to fix prices, terms of sale or production output
- ✗ Refuse to deal with customers or suppliers for improper reasons
- ✗ Make claims we cannot substantiate or inaccurate remarks about our competitors
- ✗ Divide customers, markets or territories with competitors
- ✗ Agree with others to limit production or not do business with customers or suppliers



Fair and Transparent Dealings with Suppliers

If your job involves working with suppliers, you should treat them with integrity and professionalism and observe applicable procurement standards and laws. We will not provide a supplier with confidential business information (proposed rates, winning bid information, etc.) of another supplier. Communicate honestly and openly with suppliers, seeking to understand problems when they arise and working collaboratively to find mutually satisfactory solutions.

Business Conduct Standards for Suppliers

For the sake of protecting Domtar's reputation and promoting a strong, dependable supply chain, we expect our suppliers to follow the standards of this Code, or otherwise act in a manner consistent with our standards.

If your job involves selecting or working with suppliers, help them understand our ethics and compliance requirements. Be alert to and report to your manager any conduct by a supplier, its employees or subcontractors that appears to be inconsistent with the standards of this Code.

We are committed to sourcing responsibly and ensuring that our suppliers conduct their operations in a socially responsible manner. Transparency and sustainability are critical elements to Domtar's supply chain. We expect our suppliers to be good corporate citizens in the communities in which they do business.

Additional Resources

- [*Global Antitrust Policy Competition Law Compliance Guide \(U.S.\)*](#)
- [*Competition Law Compliance Guide \(Canada\)*](#)
- [*Competition Law Compliance Guide \(Europe\)*](#)
- [*North American and EU Antitrust Law Compliance Quick Reference Guide*](#)
- [*Competitor Contact and Communications Guidelines*](#)



WE DO NOT TOLERATE BRIBERY OR CORRUPTION

What it Means

We compete for business based on the value and quality of our products and do not engage in bribery or other forms of corrupt activities. We will not offer, make or authorize payment of money or anything of value as an inducement or to influence the behavior of someone in government or private business to obtain commercial advantage, regardless of geographical location or local custom.

What We Do

Regardless of business and social customs in a particular country, we comply with all applicable laws of the United States and other countries in which we do business that are designed to prevent bribery and corruption, including the United States Foreign Corrupt Practices Act.

We never give or accept bribes or other improper payments, including kickbacks; these are prohibited. Kickbacks involve giving or accepting money, gifts, or anything of value in return for favorable treatment.

Be Agile

We do not give or receive inappropriate gifts or entertainment. In many cultures, gifts and entertainment are an integral part of doing business because they can foster goodwill and enhance business relationships. However, some gifts and entertainment can result in improper influence or an appearance of improper influence, leading to a potential conflict of interest or a violation of an anti-corruption law. For this reason, we must never offer or accept gifts or entertainment intended to influence decision-making, regardless of value.

No gift or entertainment should ever be offered, given, provided or accepted by a Domtar employee, director, agent (or member of their family) unless it:

- Is a non-cash gift (unless properly exempted and preapproved under the Anti-Corruption Policy);
- Cannot be seen as intended to influence decision-making, regardless of value;
- Cannot be seen as a bribe or payoff; and
- Does not violate any laws or regulations.

Business gifts or entertainment given or received should not be excessive or lavish. If you are not sure if a gift or entertainment is acceptable, you should consult with your supervisor, a manager, or the Law and Secretariat Department. No gifts or entertainment on Domtar's behalf, regardless of value, may ever be given or provided as an inducement or in exchange for a favorable treatment.

Charitable Contributions

Charitable contributions of Domtar funds may only be done with a pro bono purpose and in no event be linked, directly or indirectly, to the past or future acquisition of Domtar products.

Dealing with Agents

We take special care when dealing with agents, consultants and other third parties in relation to business outside the United States, ensuring that:

- We understand that providing payments that we suspect may be passed to officials outside the United States or to others in order to influence decision-making in Domtar's favor is prohibited;
- We understand that using an agent to make any payment that Domtar itself cannot make is prohibited;
- We can properly trace funds provided to an agent in connection with such business so that Domtar can verify that no improper payments are made.

The Anti-Corruption Policy details the safeguards employees must follow when dealing with such parties.

Additional Resources

- [Anti-Corruption Policy](#)
- [Anti-Kickback Compliance Policy](#)

WE AVOID CONFLICTS OF INTEREST

What it Means

Conflicts of interest arise when an employee, a director, or a member of his or her family, receives inappropriate personal benefits as a result of his or her position with Domtar. Such conflicts of interest can undermine the business judgment and responsibility to Domtar and threaten Domtar's business and reputation.

It is not always easy to separate the line between personal and professional interests, especially when personal relationships, outside employment or investments are involved, however we should never place ourselves in a conflict of interest, that is, a situation where we allow personal interests to interfere – or appear to interfere- with the business decisions we make as Domtar employees.

What We Do

We make business decisions and take actions in the best interests of the Company. This means that every decision we make while on the job must be objective and with Domtar's business interests in mind. We will never allow our personal interest to influence our actions on behalf of Domtar.

Be Agile

How to recognize a potential conflict of interest? While it is not possible to list every activity or situation that might raise a conflict of interest issue, the list below is included to help you recognize some of the more significant ones:

- Corporate Opportunities. Taking personally opportunities that are discovered through the use of Domtar assets, information or position, or using Domtar assets, information or position for personal gain or competing with Domtar.
- Gifts and Entertainment. Receiving from, or giving to, a supplier, customer or competitor, gifts and/or entertainment of more than insignificant value.
- Loans. Providing loans to, or guarantees of obligations of, employees or their family members will not be allowed without the prior written approval of Domtar's President and CEO.
- Outside Activity. Engaging in any outside activity that significantly detracts from, or interferes with, the performance of your services to Domtar.
- Outside Service. Serving as a director, representative, employee, partner, consultant or agent of, or providing services to, an enterprise that is a supplier, customer or competitor of Domtar.
- Personal Interests. Having a direct or indirect personal interest in a transaction involving Domtar.
- Personal Investments. Directly or indirectly, owning a significant amount of stock in, being a creditor of, or having another financial interest in a supplier, customer or competitor.

In summary, ask yourself:

- Could my personal interest or relationships influence the business decisions I make?
- Could it look that way to someone else?

If yes to any of these questions, it is probably a conflict. Seek guidance if unsure!

Additional Resources

- [*Procedures for the Review of Related Person Transactions*](#)



WE DO NOT SPEAK ON BEHALF OF DOMTAR

What it Means

In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities and to others, we have designated individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any public statements on Domtar's behalf.

What We Do

If the subject of Domtar comes up in any public setting, including social media, make it clear that you are a Domtar employee, and your views are your own – you are not speaking for the Company. Never disclose confidential information about Domtar, our customers, suppliers, competitors or other business partners, and never post anything that might constitute a threat, intimidation, harassment or bullying.

Be Agile

What if I already spoke on the Company's behalf?

If you realize later that you may have sounded as though you were speaking for the Company, contact your manager or the Corporate Communications Department so the Company can analyze the situation, respond as required and minimize any harm that may have been done.

- Refer all media inquiries and public requests for information to the Corporate Communications Department.
- Refer all public requests for information and inquiries from government and regulatory authorities to the Corporate Communications Department.

Additional Resources

- [Policy for Domtar Employees and Contractors Using Social Media](#)
- [Disclosure Policy](#)



WE DO NOT TRADE ON INSIDE INFORMATION

What it Means

Even though Domtar Corporation's shares do not trade on stock exchanges anymore, part of its debt is still held and traded by the public. As such, we remain subject to the United States federal and state law prohibiting the use of "material nonpublic information" when trading in Domtar Corporation securities.

What We Do

Buying or selling securities based on material non-public information we know about because our job with Domtar constitutes what is called "insider trading" and is not only unfair, but also illegal. Since we believe everyone should make investment decisions based on the same information, we do not trade on material non-public information or tip off others so that they may trade. These restrictions also apply to securities of other companies if we learn of material nonpublic information in the course of performing our duties with Domtar.

Be Agile

What makes someone an "insider"?

Any person who is in possession of material nonpublic information is deemed to be an "insider." This includes directors, officers, employees (management and non-management), as well as their family members and other persons living in the same household, friends or brokers who may have acquired such information directly or indirectly from an insider ("tip").

And what is "material nonpublic information"?

That is a complex legal question, but it is generally considered to be information not available to the general public, which would be likely to affect a reasonable investor's decision to purchase or sell Domtar securities. Such information includes, but is not limited to:

- information relating to capital structure;
- major management changes;
- contemplated mergers, acquisitions or divestitures
- pending regulatory action or significant litigation;
- information concerning earnings or other financial information etc.

Such information continues to be "nonpublic" information until it is disclosed to the general public.

Additional Resources

- [Policy Statement on Trading of Domtar Securities](#)



WE SAFEGUARD COMPANY ASSETS

What it Means

Our assets include everything that Domtar owns or uses to conduct business. It is our responsibility to use these assets, as well as Domtar's supplier, customer and other third party assets, in a manner that safeguards them from loss, damage, theft, waste and improper use, and to ensure that such assets are used only for legitimate business purposes.

What We Do

- We don't use Company's assets for our personal benefit or the benefit of others
- We protect Domtar's assets against unauthorized access, modification, disclosure or loss, in a consistent and reliable manner
- We use Domtar's Information Technology assets in a manner consistent with our job requirements and description and other related policies (including those prohibiting discrimination and harassment)
- We conduct our business activities with diligence, and we adhere to the Domtar Global Information Security Policy

Be Agile

Since Domtar's systems are intended primarily for business use, excessive personal use during working time is prohibited, as is other usage that may interfere with the system's productivity, such as using email to send large attachments or audio/video segments.

Be aware that any information you create, share or download onto Domtar systems as part of your job belongs to Domtar and we reserve the right to monitor system use at any time, to the extent permitted by law.

Do not use Domtar systems for personal business or to store your personal files. You should have no expectation of privacy with respect to information technology tools provided by Domtar or any data or information created, accessed, transmitted or stored on those tools.

Additional Resources

- [Domtar's Global Information Security Policy](#)
- [IT Acceptable Use Policy](#)



WE PROTECT NON-PUBLIC INFORMATION

What it Means

One of Domtar's most valuable assets is its confidential and proprietary business information. We must preserve the confidentiality of such information (whether or not it is considered proprietary) entrusted to us not only by Domtar, but also by employees, suppliers, customers and others related to our business.

Confidential business information includes all nonpublic information that, if disclosed, might be of use to our competitors or harmful to Domtar, its customers or suppliers. Examples of confidential information include, without limitation:

- strategic plans
- acquisition or divestiture projects,
- financial information,
- new product or marketing plans,
- customer lists and pricing,
- research and development,
- manufacturing processes,
- intellectual property and trade secrets, etc.

What We Do

We must take steps to safeguard confidential information by keeping such information secure, limiting access to such information to those who have a "need to know" in order to perform their work, and avoid discussing confidential information in public areas.

Confidential information may be disclosed to others when such disclosure is authorized by Domtar or must be made pursuant to laws or regulations. We must report any third party asking us to provide confidential information on an informal basis.

The obligation to preserve confidential information is ongoing, even after the end of service for Domtar.

Be Agile

Q. My supervisor travels often on business and is very busy. He just called me from out of town and asked to log into his files using his user ID and password to access some reports that I would not otherwise have access to. I want to help him, but should I do that?

A. No. It is against Domtar policies to share passwords. Also, access to restricted information should be limited to those with a need to know. Your supervisor will need to access his files himself either remotely using a Domtar approved VPN access, or wait until he is back in the office.

Additional Resources

- [Disclosure Policy](#)



WE MAINTAIN ACCURATE RECORDS

What it Means

Domtar maintains high standards of accuracy and completeness in its records, because integrity in our recordkeeping inspires trust by our stakeholders.

What We Do

From regulatory filings, time sheets, business reports to resumes, records serve as the basis for managing our business, for measuring and fulfilling our obligations to all of our stakeholders, and complying with, financial, tax, legal and other reporting requirements.

In preparation and maintenance of records, we must:

- Record and report information accurately and honestly;
- Comply with applicable accounting standards, practices, rules, regulations and controls, and with those of relevant authorities in the countries where Domtar carries on business;
- Ensure that all entries are promptly and accurately recorded and properly documented. Domtar's records are subject to internal and external audit. No entry may intentionally distort or disguise the true nature of any transaction;
- Never establish any undisclosed or unrecorded funds or assets for any purpose;
- Maintain books and records that fairly and accurately reflect Domtar's business transactions;
- Know and comply with Domtar's Records Management Policy

Be Agile

Q. A customer asked us to change an invoice to make it look like the sale took place on an earlier date than it actually did. Apparently, its import permit recently expired, and changing the sales date will help it avoid having to reapply for the permit. The change is easy to make and it will really help our customer. Can I go ahead and make the change?

A. No, you can't. It does not matter if the change is easy to make and it will help the customer. Our invoices are business records and should reflect the actual date on which the sale took place. Changing the date on the invoice would create a false and misleading record—a violation of our obligation to keep accurate and honest records. Also, since the customer is making the change to avoid a legal requirement, your actions would assist in breaking the law.

Additional Resources

- [Records Management Policy](#)



We Care About One Another and the World We Live in

WE CARE ABOUT HEALTH AND SAFETY

What it Means

We continuously strive to ensure a safe and healthy workplace for all employees, contractors and visitors. We utilize the foundational philosophy of Human and Organizational Performance to foster employee engagement, collaboration and accountability in identifying, preventing and eliminating hazardous conditions and the risks of injury.

What We Do

- We make employee, contractor and visitor health and safety a priority in all aspects of management practices;
- We provide an environment that is free from the effects of drug and alcohol use;
- We establish, communicate and enforce worksite-specific rules and safe work methods;
- We promote and develop our awareness, leadership and accountability in health and safety through our involvement in continuous improvement processes;
- We measure our health and safety performance in accordance with established standards, and communicate the results; and
- We conduct health and safety audits to confirm that our practices meet policy objectives, legislation and the principles of sound management.

Be Agile

Play an active role in ensuring your own safety and the safety of others by:

- Fully engaging in training opportunities
- Following the standard procedures for how work is done – wearing PPE, etc.
- Exercising a questioning attitude and being willing to stop when unsure
- Performing pre-task risk assessments and mitigating the risk you discover
- Observing and correcting or reporting at-risk conditions
- Attending safety meetings and making safety suggestions
- Contributing to all incident prevention efforts

Additional Resources

- [Occupational Health and Safety Policy](#)
- [Drug and Alcohol Policy](#)
- [Drug and Alcohol Policy in Canada](#)



WE PROMOTE DIVERSITY AND INCLUSION AND WE DO NOT TOLERATE DISCRIMINATION NOR HARASSMENT

What it Means

At Domtar, we strive to foster a culture of inclusion and diversity, connecting us closer to our employees, customers, and supplier partners. We are resilient, adaptable, and integrally tied to the communities where we operate. We create a diverse and inclusive environment where everyone feels engaged, energized, and valued.

What We Do

Domtar is dedicated to creating an inclusive environment for everyone. We provide equal opportunities in employment to all employees without regard to personal characteristics such as gender, physical abilities, race, religion, sexual orientation, gender identity or other characteristics protected by law. Discrimination and retaliation against anyone for either sharing a concern or participating in an investigation have no place at Domtar. We respect the dignity, rights and aspirations of one another, and we are committed to providing an equal opportunity work environment that is diverse and free from discrimination and harassment.

Be Agile

Your Role

Show that you appreciate others' varied backgrounds, skills and cultures. Never single anyone out for negative treatment, and be fair in all employment decisions. Base your decisions only on factors like skills, qualifications, performance and business needs – never on personal characteristics.

Watch for harassment. It takes many forms and can be verbal, physical, visual or sexual in nature. It might look like intimidation, bullying, racial slurs, sharing offensive material or making offensive or sexual jokes, comments or requests.

It happened – now what do I do? If you see, experience or suspect harassment or discrimination, speak up about it – either directly to the person or through your manager, Human Resources, or EthicsPoint Hotline (in accordance with local regulations for reporting). We take this behavior seriously and do not tolerate retaliation against anyone who reports in good faith.

Additional Resources

- [Anti-Discrimination and Anti-Harassment Policy](#)
- [Diversity & Inclusion Council Charter](#)



WE CONDUCT BUSINESS IN A SUSTAINABLE WAY

What it Means

We put sustainability at the heart of everything we do, and strive to conduct business in an environmentally responsible manner. We are committed to compliance with all applicable environmental laws and regulations.

What We Do

- We source wood responsibly, using recognized certification standards.
- We focus on continuous improvement and set goals around improving our waste, water and greenhouse gas emissions.
- We use resources more efficiently by recycling material used in or created from the manufacturing of wood fiber-based products, one of the most recycled resources on the planet.
- We work with the world's most recognized environmental groups to continue our sustainability journey.
- We are committed to philanthropy, employee development and volunteerism and supporting local jobs.

Additional Resources

- [*Environmental Policy*](#)
- [*Community Investment Policy*](#)



WE FOLLOW PRIVACY LAWS

What it Means

People trust us to protect their personal information, and we take our responsibility and obligations to our customers and employees seriously to collect, use and process any personal information only for legitimate business purposes, for the required period of time and to protect it from possible loss, unauthorized use or disclosure to third parties.

What We Do

We respect the privacy of our customers, our coworkers and others with whom we conduct business, and we handle their personal information with care. We use personal information only for identified purposes and we do not share that information with anyone inside or outside Domtar unless we are authorized to do so. Be aware that certain personal information, such as medical information, require an extra level of protection and a higher duty of care based on applicable law.

Be Agile

- Know the kinds of information considered “personal information”
- Follow the privacy laws and regulations of the country or countries in which you work
- Safeguard personal and personnel information from unauthorized disclosure
- Make sure you follow the processes and practices we have in place to protect our networks, computers and data from unauthorized access
- Report any breaches immediately to the Data Privacy Officer

Q. One of our new vendors wants to say “hello” by sending everyone on my team a coupon and a free sample of their product. The vendor has asked me for a list of my coworkers’ names and addresses. Is it okay to provide them?

A. Before doing anything, contact the Data Privacy Officer. Even if the intent behind the request is well-meaning, and even if your coworkers might like receiving the samples, supplying this information would violate our commitment to keeping private information private.

Additional Resources

- [Information Protection and Privacy](#)
- [Domtar European Privacy Policy- Customers](#)
- [Domtar European Privacy Policy-Employees](#)
- [GDPR Compliance Policy](#)
- [HIPAA Privacy and Security Policy](#)



HIPAA

WE RESPECT HUMAN RIGHTS

What it Means

Respect for human rights is one of our fundamental values. Through our actions and policies, we strive to respect and promote human rights in our relationships with our employees and suppliers. Our aim is to help increase the enjoyment of human rights within the communities where we operate.

What We Do

We avoid causing or contributing to human rights infringements through our business actions, and expect our suppliers to do the same.

Additional Resources

- [*Human Rights Policy*](#)



One last thing..

Thank you for your commitment to Domtar and our Code of Business Conduct and Ethics. Our reputation was built by generations of caring, agile and hardworking employees like you who do what is right every day, in every act and every transaction.

Remember that as an employee, you represent Domtar to the world. You can help demonstrate our good citizenship by upholding our high standards and being aware of your own actions and how they might affect others.

Follow not only our Code, our policies and the laws and regulations that apply to your work, but also your conscience. When something does not feel right or puts Domtar, our people or those we serve at risk, report your concerns. When you do, you preserve our good name and reputation and help us to better navigate our journey for generations to come.

For more information or advice on a specific situation, please consult with your manager or the appropriate resources listed on the following page.



RESOURCES

Law and Secretariat Department

Nancy Klembus	SVP, General Counsel and Corporate Secretary	Nancy.klembus@domtar.com	803-802-8065
Ania Brzezinski	Vice-President, Associate General Counsel	Ania.brzezinski@domtar.com	514-848-5003
Marguerite Goraczko	Manager, Senior Legal Counsel	Marguerite.goraczko@domtar.com	514-848-6450
Josée Mireault	Director, Corporate Law and Assistant Secretary/ Data Privacy Officer	Josee.mireault@domtar.com	514-848-5151
Inna Nekhim	Director, Legal Services	Inna.nekhim@domtar.com	514-848-5001

Other

Rick McAtee	SVP, Human Resources	Rick.mcatee@domtar.com	803-802-8182
Greg Ramsey	Vice-President, Internal Audit	Greg.ramsey@domtar.com	514-848-6919
Kathy Wholley	Vice President, Communications & Public Affairs	Kathy.wholley@domtar.com	803-802-8006
Giuseppe Lobelia	Manager, Customs and International Trade Compliance/Export Compliance Officer	Giuseppe.lobelia@domtar.com	514-848-5312

Ethicspoint Hotline – <http://www.domtar.ethicspoint.com> or 866-323-3653