

In response to the California Transparency in Supply Chains Act, Temple-Inland is making available the following information about eradication of slavery and human trafficking from the direct supply chain for our products.

Verification of Product Supply Chains

To what extent does Temple-Inland engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery?

One of Temple-Inland's core values, as reflected by our Standards of Business Conduct and Ethics (our SOBCE), is the commitment to operate ethically and with integrity, and in compliance with all applicable laws, rules and regulations. Those laws, rules and regulations include laws addressing human trafficking and slavery. We seek to use only suppliers that embrace the same commitment. To that end, our standard contracts for purchases of goods or services require our suppliers to provide those goods or services in compliance with applicable law. We have not used third party services for verification of our evaluation of the risks of human trafficking and slavery in our product supply chain.

Evaluating Supplier Compliance

To what extent does Temple-Inland conduct audits of suppliers to evaluate supplier compliance with our standards for trafficking and slavery in supply chains?

Temple-Inland reviews responses that we receive from our suppliers to our certification requests (see next item) for indication of whether materials we purchase from the suppliers fail to comply with any laws regarding slavery and human trafficking, and to determine if a supplier's response to our certification request indicates that reassessment of our use of the supplier is appropriate. We have not used independent, unannounced audits for verification.

Supplier Certification

To what extent does Temple-Inland require direct suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business?

Temple-Inland asks suppliers from whom we purchase under contract the primary materials incorporated into our products to certify to us that those materials comply with the laws regarding slavery and human trafficking in the country or countries in which they are doing business. We note that except for our packaging products that specify 100% virgin wood fiber, the majority of our packaging products include recycled fiber from domestic outside sources that vary from time to time. The ultimate provenance of the recycled fiber cannot be traced.

Internal Accountability

To what extent does Temple-Inland maintain internal accountability standards and procedures for employees or contractors failing to meet our standards regarding slavery and trafficking?

Temple-Inland's human resources management, with assistance of our legal department, monitors our facilities and departments on an on-going basis for compliance with our policies and procedures and applicable law. Furthermore, every Temple-Inland facility and department is subject to internal audit for compliance with our policies and procedures and with applicable law. We cooperate with audits by the U.S. Department of Labor to verify our compliance with labor laws.

Every Temple-Inland employee is subject to discipline, up to and including termination, for violation of any Temple-Inland policy or procedure or for inappropriate conduct, among other things. Failure to follow our SOBCE, which requires compliance with applicable laws on human trafficking and slavery, is a ground for discipline or termination.

Temple-Inland's standard contracts for purchase of goods or services reserve the right to terminate the contract for the contractor's material breach of any of the contract's terms. Failure to comply with applicable laws on human trafficking and slavery in the contractor's performance of its obligations under the contract would be a basis for termination of the contract.

Internal Training

To what extent does Temple-Inland provide our employees and management who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chain of our products?

Temple-Inland reinforces the obligation of every employee, in or out of management, including those with direct responsibility for supply chain management, to conform to our SOBCE in several ways. On hiring, each new employee is required to read our SOBCE and provide us with written confirmation that he or she has read it and agrees to comply with it. In addition, our Compliance and Ethics Department conducts annual SOBCE training and certification for all employees. A paper copy of the SOBCE is sent to the home of each hourly employee with a letter explaining our compliance and ethics expectations. In the letter, we also ask the employee to contact us if he or she does not agree to be bound by the SOBCE terms and conditions or if he or she had something that needs to be reported. Temple-Inland's salaried employees are required to complete an online training course, certify their acceptance of the SOBCE, and make disclosures they feel are necessary.