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**INTERNATIONAL
PAPER
COMPANY**

CORPORATE AFFAIRS
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*The attached is in response to
your request for information.*



CORPORATE AFFAIRS



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INFORMATION ABOUT
GRASS ROOTS CORPORATE AFFAIRS
AT INTERNATIONAL PAPER COMPANY

1. Introductory presentation by IP's Chief Executive J. Stanford Smith to Business Roundtable June 16, 1975
2. Detailed review of IP Corporate Affairs program
3. Copies of agendas of some of the training seminars attended by Corporate Affairs Representatives
4. Corporate Affairs non-financial objectives for IP business units and procedural guides for evaluating performance
5. Company's policy statement on Corporate Affairs

July 21, 1975

REMARKS BY
J. STANFORD SMITH
CHAIRMAN
INTERNATIONAL PAPER COMPANY
TO BUSINESS ROUNDTABLE
ANNUAL MEETING

JUNE 16, 1975

The present Congress brings to mind a statement of Supreme Court Justice Louis Brandeis. In a 1928 opinion he said:

"Experience should teach us to be most on our guard to protect liberty when the Government's purposes are beneficent. Men born to freedom are naturally alert to repel invasion of their liberty by evil-minded rulers. The greatest dangers to liberty lurk in insidious encroachment by men of zeal, well-meaning but without understanding."

Most legislators are well-meaning, but if we cannot get more understanding on Capitol Hill, we may soon find industry regulated into stagnation or unable to finance its future.

In connection with the tax reduction bill, we recently saw the Senate pass a series of anti-business amendments without even holding hearings. Most of them were removed in Conference, thanks in part to information supplied by persons in this room, but the easy passage of such amendments in the first place presages trouble when Congress approaches so-called tax reform in the months ahead.

Before attempting to tell you some of the things I think we should do, let me list five things we cannot afford to do:

- (1) We cannot depend on our Washington Representatives and industry associations to do all of our Congressional and Administrative contacts. While Washington reps and associations are important and highly effective in many situations, they cannot adequately cover the 535 Senators and Congressmen and their hundreds of staff people, plus the scores of key people in the Administration.

We are dealing with a new style of Congress today. Many Senators and Congressmen from urban areas have replaced traditionally conservative members from rural areas. The unions very nearly succeeded in electing the veto-proof Congress that they called for.

Committee make-up has been changed, as well as key committee chairmen. The important House Ways and Means Committee is one example.

Its membership was increased from 25 to 37, with the balance changed from 15 Democrats and 10 Republicans to 25 Democrats and 12 Republicans.

Moreover, committee chairmen no longer have control over what their committees will do; in fact they often cannot even accurately predict what they will do.

This means that we cannot just work to inform Congressional leaders and committee chairmen. We need to get the attention of virtually every member of Congress.

- (2) We cannot depend just on letters and telegrams to get information across.

So much written material pours into Congressional offices that most of it never gets to the legislator's desk. Senator Jacob Javits, for example, receives more than 260,000 letters and telegrams a year.

Senators and Congressmen take a real interest in personal letters from business

leaders they know personally, but somehow you must make sure a legislator's staff knows you know the boss, or he may never see your letters and wires, even though his signature is on the reply.

The surest way to get your message across is to deliver it in person, and I'll be talking about a program aimed at doing exactly that.

- (3) We cannot afford to just concentrate on old friends, and those who understand business.

New members of Congress are not following the traditional practice of listening and learning as freshmen. Instead, they are demanding a bigger voice in both decisions and procedures. And, as a result of the elections last year, many whose understanding we had gained in the past aren't there anymore.

So we find we must carry our story to many who are antagonistic or uninformed as to our views. But most are willing to listen, as we must try to get our message to them.

- (4) We cannot just "oppose" legislation, and be successful.

We have all seen examples of a legislator we thought was opposed to industry's position accept a positive proposition, well thought-out and well presented. Rather than use all our energy to fight a proposal we are opposed to, we often can best use our resources by researching, preparing, and advancing another proposal that meets the public interest in ways that also serve the goals of business.

- (5) With so much at stake with government, Chief Executives cannot completely delegate responsibility for contacts with Congress and government.

The role of the Business Roundtable in marshalling Chief Executives is the best illustration of this point I know.

Now having mentioned five things we cannot afford to do, let me talk about some things we can and should do.

I know that many of your companies are well organized in the public affairs field, but John Harper and Wallace Bates have asked me to describe the contact program which has been developed at International Paper. We call it "Constituent Power."

We have a Vice President of Corporate Affairs in Washington, Ralph Kittle, whom many of you know. He and a small staff are responsible for maintaining contact with Congress and with various agencies of government dealing with issues important to us. As an international land-resource management Company, we are vitally affected by a wide range of government policies on land use, forest management, hydrocarbons and minerals, pollution control, water resources, taxation, and international trade, as well as those policies which hit every manufacturing company.

In addition to his Washington operations, Ralph Kittle directs a network of Corporate Affairs representatives. At each of the 160 places in the U.S. where we have manufacturing, woodlands, oil, or sales operations' a person is assigned corporate affairs responsibility as part of his job description. These 160 locations cover 127 congressional districts in 35

states. Thus there are IP representatives who are constituents of and who have assigned responsibility for 127 Congressmen and 70 Senators.

These 160 Corporate Affairs representatives are plant managers, wood superintendents, sales managers, and similar key employees. But part of their job responsibility includes citizenship and community representatives getting to know their legislators personally, inviting them on plant tours, helping them know more about what our Company means to the economy of the area, and thus being in a position to provide effective input on important business issues as they arise.

We also have 12 Regional Corporate Affairs Representatives in the areas where we have large interests, who spend all or a major portion of their time in Corporate Affairs activity at the local, state and national levels. They are more experienced and help coordinate the work of the part-time local Corporate Affairs Representatives.

We have found this grass roots "constituent power" very effective in our relations with government, so let me give you a little more detail as to how we try to operate it.

To help the 160 local Corporate Affairs Representatives be most effective, corporate affairs holds special training seminars twice a year -- on both the procedural and substantive aspects of public issues.

Then, as important issues come up, Ralph Kittle asks all representatives to take specific action within a specified time frame. For example, during the Christmas recess last year each representative hand-delivered the excellent paper prepared by Perry Wilson on behalf of the Roundtable against wage & price controls along with testimony by IP's President Jud Hannigan before the Senate Banking Committee on the same subject.

When the International Trade Bill was before the House, the local representatives invited their Congressmen to an IP breakfast we gave in Washington on the subject. Although it had to be held on a Monday morning, usually regarded as an undesirable time, more than 100 Congressmen came out of the 127 invited. We don't think we would have had this attendance if Congressmen had been invited from just Washington or New York, and all but three attending voted favorably on the Trade Bill.

In addition to the seminars for Corporate Affairs representatives, once a year all Company officers meet in Washington. In the morning we review the Company posture on all current major issues. That afternoon all officers call on Senators and Representatives from areas where we have operations plus key Committee Chairmen. This way every officer has first-hand knowledge and experience as to the challenges faced by those in his organization with Corporate Affairs responsibility.

The real teeth in our program come from trying to make corporate affairs not an extracurricular activity but a part of the job assignment of every officer, manager, and part-time Corporate Affairs representative. We do not ask anyone to take action or make presentations counter to his own beliefs or judgment. But, if a person is requested by our Washington Corporate Affairs Vice President to make contact with certain legislators on a particular subject at a particular time, he is expected to carry out the mission or explain why he considers it unwise, so that his response may change the request or change

the assignment to another person. Participation in this Corporate Affairs education effort is a Budgeted Non-Financial Objective on which all persons on Incentive Compensation are measured, and the quality of their participation has impact on their IC payments. This, also helps assure participation and keen personal attention.

Now, in summary, let me list what we regard as the 10 commandments for dealing with Congress and the Administration.

- (1) Have a well-organized grass roots "constituent power" program.

Imagine our strength if every company in the Business Roundtable had a trained, even though part-time, government relations representative active at each of its operations across the country!

- (2) Develop a well-supported political contributions program for employees.

The Election Campaign Law as amended last year provides explicit permission for Company sponsored voluntary political campaign funds, whether you are a government contractor or not.

This makes it legal and logical to encourage employees through a company program to contribute to better government by supporting candidates for political office. The NAM has an excellent booklet on the subject entitled "Political Participation -- Permissible Political Fund Raising for Corporations." I urge you to see that your legal and public affairs people are familiar with it.

- (3) Develop sound, easily understood position papers on issues with government.

These must be thoroughly researched and then written in freshman high school English. They must be oriented to the public interest and written so that in the words of Habbakuk, "he who runs may read."

At IP, we try to present our views on a public issue in this way: First, why it is important to our country, Second, why it is important to a legislator's state or district, and third why it is important to business progress.

- (4) Gain public support for your position.

Private business in the U.S. is the biggest publishing venture in the world. It

regularly reaches 64 million employees through company publications. This is three times the U.S. circulation of Reader's Digest -- the most successful publication of all time. This is seven times the circulation of Time, Newsweek, and U.S. News & World Report combined.

Yet, we too often use Company publication space primarily for babies, birthdays, and bowling scores!

What employees really want to know, and what Congressmen want to know that they know, are the economic realities that vitally affect their paychecks. It is ironic that union publications usually do a better job than company publications in presenting economic issues. And Congressmen know it!

What I have said regarding company publications applies equally to publicity in hometown newspapers so that Congressmen can see that business leaders are building public support for constructive economic policies.

- (5) Keep personal letters and telegrams flowing to legislators, but on important matters, make personal visits.

If necessary, we are prepared to send all of our Government Relations Representatives to Washington on key issues.

- (6) Be sure such representatives thoroughly understand the issues so that they can convincingly convey your views to legislators and government officials.

Ralph Kittle has found role playing extremely useful in his training seminars for this purpose.

- (7) Know the legislator's staff.

They can shield the legislator from appointments or help make him available. Even when you personally know a Senator or Congressman, staff members may short circuit communications if they don't know this.

Also, many staff members are highly influential on certain legislation.

- (8) "Join the dialogue" with those opposing your views.

Sometimes you can change their views if you convince them you really represent the views of people "back home," or often you can win a compromise.

- (9) Performance of all employees doing government relations work must be regularly evaluated and outstanding performance rewarded.
- (10) Chief Executives must give strong leadership and support to make the program work.

These are some of the ideas that have been developed through trying to get constructive information before members of the Congress and Administration.

Our people will be glad to review our trials and errors with any of your associates, and we will welcome the opportunity to profit from your experience as well.

Working together, we can develop better understanding of how policies that permit business to prosper benefit the nation and all its citizens.

GRASS ROOTS CORPORATE AFFAIRS
AT INTERNATIONAL PAPER



International Paper Company's grass roots support program concerns constituent power, putting emphasis not on what happens in Washington, but on what happens "back home."

The many operations around the country of major companies make them corporate constituents of large numbers of Senators and Congressmen as well as state legislators and local elected officials. Their operations affect the economy of their areas, and their employees can speak to their legislators as "back home" voters and influential constituents--if they go about it properly. This is a brief description of how International Paper goes about it.

IP has a representative at each of 160 Company locations across the country who have Corporate Affairs assigned as at least a small part of their job responsibility.

They are in 127 Congressional districts and in 35 states.

This means that we are corporate constituents of 30 percent of the House of Representatives and of 70 percent of the Senate.

These 160 local representatives attend special training seminars twice a year to learn how to do the job and learn the facts on important legislative issues. Their responsibility is to get to know on a personal basis their Congressman and two Senators and key state legislators and to make the legislators familiar with our operation and its effect on the economy of their area.

The representative must know the Company position on key issues, and when called upon, communicate in a persuasive manner these positions to the legislators by telephone, letters, telegrams, and personal visits.

We have two-way communication with these Corporate Affairs Representatives. We send a weekly corporate affairs newsletter to them and to all our managers--one week covering federal matters and the other, state and local matters. We require our Corporate Affairs Representatives to communicate with us on a regular basis by teletype or telephone regarding matters arising in their areas. They report to the Washington Office on their visits and communications with legislators.

We also have 12 regional Corporate Affairs Representatives in areas where we have large interests, who spend a major portion of their time in government relations at the local, state, and national levels. They are more experienced, and help coordinate

the work of the part-time local Corporate Affairs Representatives. They also help in our training seminars.

When the 160 local representatives were first given their Corporate Affairs responsibility, they responded with initial enthusiasm. But when they found that this added assignment required hard work and took time away from their traditional duties, their enthusiasm began to wane, despite the fact it was part of their job description.

But strong management leadership solved the problem. IP's Chairman remedied the situation with one sentence at our next management meeting. He said as follows: "Anyone who does not respond to a request for action from our Washington Office should not be on the payroll the next morning." Overnight the old enthusiasm returned. Another effective stimulus has been the mandating by our Chief Executive of Corporate Affairs as a key corporate objective upon which incentive compensation is based both for managers and their divisions.

Following are 10 precepts of our program:

Precept #1

New lobbying methods are needed as Congress changes.

We realized some years ago that as a major corporation, industry association representatives and Washington representatives could no longer adequately represent us in Washington.

One of the finest additions to industry's Washington efforts has been the willingness of top executives of major companies

to get directly involved in Washington matters. Their interest and frequent visits have made a difference. They can, however, increase the effectiveness of their efforts a hundred fold by organizing employees at various company locations in a "grass roots" support program.

With the changes that have occurred in Congress in the last few years, industry can no longer be effective by just knowing the Congressional leaders and committee chairmen. Grass roots support is essential to cover the 535 Senators and Congressmen plus their hundreds of staff people.

Precept #2

A most important concern of a politician is, "What will help me get reelected?"

We must always keep this political fact of life in mind.

Precept #3

Our representatives must personally agree with the Company position on legislation before being expected to support it.

No one in IP is expected to take requested action with government unless he personally agrees with it. However, when he does not agree, he must let us know of his disagreement so that we can give his views careful consideration.

Precept #4

A well-informed constituent who personally knows his legislators can be the most persuasive force with Congress.

A most influential event with a legislator is when a constituent he personally knows from "back home" expresses a well-

thought-out position on an issue affecting an operation in his district or state.

Precept #5

Make sure the legislator's staff knows you.

The legislator's staff must know you and know of your personal acquaintance with their boss, or the legislator may never see your letters and wires, even though his signature might be on his reply. Also, the staff will try to shield him from appointments if the personal acquaintanceship is not known to them.

Precept #6

On important issues, make personal visits.

To make appointments, the constituent should call from his home district saying that he's so concerned about a particular issue that he's coming to Washington to speak personally to the legislator about it, asking for a specific time for their meeting. On these important issues, don't depend on letters or telegrams. Pressure groups of all kinds are generating so much written material that it's difficult to get it seen by the legislator. One group in Washington says it can send out one telegram to its members and get a response of one-half million letters and telegrams to Capitol Hill. Senator Jim Buckley, for example, gets 5,000 letters and telegrams a week.

Precept #7

Visits by many get results and cannot be ignored.

For very important industry issues, a carefully planned and executed "march on Washington" can get attention. The day many industry executives spent in Washington on the trade bill, with the many Capitol Hill visits they made, is an example of how to do this successfully.

Precept #8

Responsibility must be fixed and periodically evaluated.

People doing government relations work must have this responsibility as a part of their job description for which they are periodically evaluated and held accountable.

Precept #9

Many operations equal great potential for influence.

At every location, companies should have at least one person specifically assigned responsibility for government relations, in building their broadest corporate constituency and influence with Congress.

Precept #10

Top executive leadership and mandates of performance in government relations are essential to effectiveness.

The program operates along the same lines in state capitols and with local governments. This state and local program is monitored from IP's Washington Office, whose staff also covers the Congress and the multitude of federal agencies for the Company.

Our grass roots support program was established 15 years ago at about 30 of our major operations. The program was broadened three years ago to cover every operation of the Company.

One feature of our program that should be mentioned is the annual lobbying experience of all of our 50 highest company executives.

For a number of years we have had our annual Corporate Affairs meetings in Washington. We invite about 50 people from across the country, including regional Corporate Affairs Representatives, retained legal counsel, and selected local Corporate Affairs Representatives.

We spend three days in getting from them first-hand information on politics and legislation in states and localities where we do business, in giving them information on what is going on in Washington and in the Company itself, and in meeting with key government officials and staff people.

For one very full day our top management people join the meeting. We begin the day with a discussion of legislative issues important to the Company. We review our Company positions on these issues and supply briefing materials on them which have had prior approval of appropriate key executives. The rest of the day is spent in intensive lobbying on Capitol Hill.

Our executives make their appointments well ahead of coming to Washington. Some make their rounds of appointments alone, and others take regional and local Corporate Affairs Representatives with them.

For that day, Capitol Hill is a beehive of International Paper activity. Of course a number of our executives come to Washington from time to time during the year as required, but on this day there is no question of International Paper's presence and interest in the Congress.

July 18, 1975

Corporate Affairs Seminar

International Paper Company

Fall, 1972

Session I

Welcome and Introduction
(All should introduce themselves
and give job and location)

Explanation of the Corporate Affairs
Program (Advise all of need to
keep notes)

(Distribute Gorman Memo)
Review of Local Corporate Affairs and
Responsibilities of the Local Corporate
Affairs Contact Representatives.
(Distribute legislative support list
and state booklet)

Legislative advocacy

Recognizing Issues (Distribute Issues
List)

Lunch

Developing your resources

Maintaining communications

Case Problems

Coffee

Presentation of Case Problem Solutions

Wrap-up (Distribute Questionnaire and
Directory Pages)

Corporate Affairs Seminar

International Paper Company

Spring, 1973

Session II

The Legislative Process

Reception and Dinner
Prominent Political Speaker

Breakfast

Regional Corporate Affairs Reports

Selected Federal and State Issues

Coffee Break

Meet the Senator

Film — "The Right To Petition"

Lunch

The Legislative Process and
Legislative Advocacy

Case Problem

Case Problem — solutions

Wrap-up

Corporate Affairs Seminar

International Paper Company

Fall, 1973

Session III

Communications in Corporate Affairs

Communications in Corporate Affairs --
How Deficient Are We?

Two-way communications -- everyone's
responsibility

Things we need to know -- political
and legislative intelligence

Public officials -- the asset in
grass roots communications

Federal Issues Report

Regional Issues Report

Coffee Break

More on the Legislative Process

Lunch

Being Effective in Your Area

Elected officials -- how to get to
know them

Trends -- how to see them and
recognize impact

Resolution of Question on Trends

Film: "Politics in Action"

Adjourn

Corporate Affairs Seminar

International Paper Company

Spring, 1974

Session IV

Federal Issues

Corporate Affairs to Date

Regional Corporate Affairs Report

Corporate Affairs Issues

Foreign Trade
Taxes
Energy
Economic Controls
Rail Transportation
Land Use

Lunch

Corporate Affairs Issues

Solid Waste and Recycling
Workmen's Compensation
Private Pensions

Film: "If Elected"

Practical Applications of the Film

Adjourn

Corporate Affairs Seminar

International Paper Company

Fall, 1974

Session V

Effective Civic Participation

Introductory Remarks

Overview of Corporate Affairs Philosophy

- Develop political sophistication
- Improve relationships with branches of government
- Implement grass roots support system

Effective Civic Participation & The Corporate Affairs Program

- Components of program
- Effects of present political climate
- Motives of participation

"Do It Now" — Slide presentation and Discussion

The Don'ts

Lunch

The Do's

Why Use Your Voice in Government

Discussion of local candidates, issues and the political climate — local representatives

Adjourn

CORPORATE AFFAIRS SEMINAR

International Paper Company

Session VI

Spring, 1975

Working With Your Legislator

- I. Know the Legislative Process
- II. Know the Communication Skills
 - a. Letters
 - b. Meetings
 - c. Plant Tours
- III. Know the Issues
 - a. Federal
 - 1. Taxes
 - 2. Economic Controls
 - 3. Land Use
 - 4. Transportation
 - 5. Energy
 - 6. Solid Waste
 - 7. Air & Water
 - 8. Multinationals
 - b. State

CORPORATE AFFAIRS

Budgeted Non-Financial Objectives

for

Each Business Unit

To insure that each operation through its Corporate Affairs Representative participates fully in the Corporate Affairs program by:

1. Responding promptly to action requests when issued by the Corporate Affairs Office.
2. Participating in Corporate Affairs training seminars.
3. Developing a working relationship with federal, state and local government officials of importance to the Company.
4. Monitoring and promptly reporting on government and political activity which could affect the Company.

December 17, 1974

CORPORATE AFFAIRS

Procedural Guides for Evaluating Performance
Budgeted Non-Financial Objectives
for Each Business Unit

Objective

Guide

1. Prompt response to action requests when issued by the Corporate Affairs Office.

- a. Be certain the problem and action requested is thoroughly understood, or if the Corporate Affairs Representative is not in agreement with the Company position of action requested, immediately contact the Corporate Affairs Office.
- b. Communicate with legislators or government officials as requested.
- c. Inform Corporate Affairs Office, and the Division Manager if he desires, of the action taken and responses received as a consequence of that action.

2. Participation in Corporate Affairs training seminars twice a year.

- a. Attend scheduled meetings, or arrange to attend another session of that meeting.
- b. Be prepared to fully participate in the seminars by contributing ideas and experiences and taking full part in the problem solving exercises.

. . . / . . .

Objective

Guide

3. Development of a working relationship with the federal, state and local government officials of importance to the Company.

- a. Develop personal acquaintances with these officials.
- b. Visit these officials at least once a year, stressing IP's continued interest in them and their work, and informing them of issues of concern to IP.
- c. Arrange a visit to a Company operation once a year for at least two of these officials.
- d. Report to the Corporate Affairs Office in Washington on all visits with government officials.

4. Prompt monitoring and reporting on the government and political activity in the area which could affect the Company.

- a. Monitoring and reporting should be conducted on a year-round basis, not just during legislative sessions.
- b. Regional and local Corporate Affairs Representatives should make special reports to the Corporate Affairs Office from time to time as anything of consequence occurs. Such reports also can go to division management as desired by the Division Manager.
- c. Regional Corporate Affairs Representatives should make regular reports once a week by TWX or telecopier to the Corporate Affairs Office in Washington.

. . . / . . .

The Division Manager should establish such reporting system as he may desire for the Corporate Affairs Representatives within his division to assist him in evaluating their performance. The Corporate Affairs Office in Washington will notify the Division Manager once a year of the performance of his division's Corporate Affairs Representatives if performance is satisfactory or better, and if less than that, will notify the Division Manager and the Executive Office immediately. The Washington Office also will inform the Budgets and Controls Office in New York on the overall Corporate Affairs performance of each division or unit.

Performance on all the above factors will be rated as to the degree of achievement on the basis of a) outstanding, b) above average, c) satisfactory, d) needs improvement, and e) unsatisfactory. This is the same scale used for the performance evaluation for exempt salaried personnel.

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December 17, 1974



CORPORATE POLICY GUIDE

INTERNATIONAL PAPER COMPANY



SUBJECT: Corporate Affairs

NUMBER: 25

EFFECTIVE: 4/1/74

SUPERSEDES: New

PAGE: 1 of 2

It is the policy of International Paper Company to participate in the process of good government wherever we operate through informed and effective working relationships with government at all levels. In so doing, our objectives are to fulfill our obligations as a responsible corporate citizen and to protect and promote the Company's interests in a manner consistent with the best interests of the countries and communities concerned. We call this function Corporate Affairs.

The social and economic consequences of political and government action vitally affect us as individuals and as a corporation. They influence the way we conduct the Company's business and the results achieved. Because the Company is forest based and ecologically visible, its operations, raw material supply and products—more than with most other companies and industries—are under increasing scrutiny and government regulation. The Company's size, diversification and geographic spread subject it to laws and regulations from hundreds of governments. Therefore, we consider the participation by employees of International Paper Company in the Company's Corporate Affairs activities to be a function of critical importance.

The proper performance of Corporate Affairs is a part of the job description of all managers and those they have designated as Corporate Affairs representatives. Managers are expected to encourage the participation of the other employees under their supervision also.

Company positions on selected U.S. federal, state and local government issues will be circulated from time to time, and local management and Corporate Affairs representatives will be requested to take specific action regarding them by our Washington Corporate Affairs office. Employees receiving such requests are expected to take the specified action and so notify the Washington Office, if they believe the position and the action are correct. Employees are not expected to advocate a Corporate Affairs position or take a requested action which is inconsistent with their own personal views. However, it is necessary that employees in such situations notify the Washington Corporate Affairs office of the disagreement and the reasons, so that the Company can take this into consideration in evaluating its position or requested action. We shall strive always to make our Corporate Affairs positions and actions morally right, economically sound, and good for the country, International Paper, our employees and their jobs.

Local management of operations of the Company or subsidiaries outside the United States are requested to advise the Corporate Affairs office through their line organization of positions they are taking on issues in their countries.



CORPORATE POLICY GUIDE

INTERNATIONAL PAPER COMPANY

SUBJECT: Corporate Affairs

NUMBER: 25

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SUPERSEDES: New

PAGE: 2 of 2

Responsibilities and procedures applicable to this policy are set forth in the Corporate Affairs Manual. Any questions of interpretation of this Company policy should be referred to the Corporate Affairs Department.

REFERENCE:

Corporate Affairs Manual.