

American Packaging Corporation Code of Conduct

American Packaging Commitment

The American Packaging Corporation (APC) family believes in the highest level of integrity and ethics in the way we conduct business. This applies to our customers, employees and supplier relationships which has been a cornerstone in our culture since 1902 and is an essential ingredient in our future success.

At APC we conduct our business with honesty and integrity, and we expect our business partners' values and business practices to mirror ours. APC maintains relationships with customers and suppliers who share our commitment to:

1. Protection of human rights of employees and the treatment of all employees with dignity.
2. Creation of safe working conditions and a healthy work environment for all workers.
3. Stewardship of the environment and an ongoing effort to reduce the environmental impact of operations.
4. The highest standards of ethical conduct and compliance with fair business practices.

These expectations and commitments are contained in this Code of Conduct (the "Code").

APC expects its partners to meet or exceed our expectations set forth in this Code and believe that through a true partnership with customers and suppliers we will consistently build on our respective principles. This Code applies to all APC facilities, as well as others with whom they do business. Our partners will ensure that the Code is communicated to its employees and subcontractors in a manner understandable to all.

When local laws are less restrictive than the principles set forth by APC, we expect our partners to follow our principles. Conversely, when local laws are more restrictive than our principles, we expect our suppliers to follow local laws.

Human Rights and Labor

APC supports and respects protection of the human rights of workers and treats all employees with dignity by:

1. **Prohibit Harassment, Harsh or Inhumane Treatment:** APC provides a workplace free from harassment, threats of violence, corporal punishment, coercion, sexual exploitation, sexual or other abuse.
2. **Forbid Discrimination:** APC does not discriminate in hiring and employment practices (including promotion, training, rewards) on the grounds of race, color, ancestry, religion, gender, sexual orientation, age, disability, pregnancy, genetic information, national, social or ethnic origin, or military/veteran status.
3. **Prevent Involuntary Labor:** APC does not use forced, bonded, or indentured labor or prison labor.
4. **Comply with Working Hour Requirements:** APC complies with all applicable working hour requirements as established by local laws.
5. **Comply with All Wage and Hour Laws:** APC complies, at a minimum, with all wage and hour laws and regulations, and provides legally mandated benefits, and pays employees in a timely manner and conveys the basis on which workers are being paid.

Health and Safety

APC is committed to creating safe working conditions and a healthy work environment for all of their employees by:

1. **Establish Regulatory Requirement Processes and Programs:** APC has in place proper processes and programs that will drive safety, health, and environmental compliance with regulatory requirements to which they are subject by state and local authorities.
2. **Communicate Hazards:** APC ensures that workers receive appropriate workplace health and safety information, training and warnings, and trains all employees on chemicals or any hazardous or toxic substances used in the workplace.
3. **Prevent Occupational Injury:** APC eliminates physical hazards where possible, establishes safe work procedures, and provides appropriate personal protective equipment. APC maintains its equipment in safe operating condition.
4. **Prevent Chemical Exposure:** APC identifies, evaluates, mitigates, and where possible, eliminates worker exposure to chemical, biological and physical hazards and where hazards cannot be eliminated, APC

provides appropriate controls to address the hazard. In all cases, APC provides safe work procedures and appropriate personal protective equipment.

5. **Prepare for Emergencies and their Response:** APC anticipates, identifies and assesses emergency situations and events and minimizes their impact by implementing emergency plans and response procedures, including employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and first-aid supplies.
6. **Establish Occupational Safety Procedures:** APC establishes procedures and systems to manage, track, investigate and report occupational injury and illness.
7. **Mitigate Ergonomics Risk:** APC identifies, evaluates, and mitigates worker exposure to physically demanding tasks, highly repetitive or forced tasks.

Environment

APC demonstrates good stewardship of the environment and works to reduce the environmental impacts of their operations on the environment by:

1. **Prevent Banned or Restricted Product Content:** APC implements programs to ensure products do not contain restricted or banned materials. APC and our supplier base does not use minerals mined in and around the war torn region of the Democratic Republic of the Congo, nor any minerals mined in conditions of armed conflict and human rights abuses.
2. **Manage Hazardous Materials Appropriately:** APC identifies and manages chemical and other materials posing a hazard if released to the environment and ensures safe handling, movement, storage, recycling or reuse and disposal of such materials. APC has systems and procedures in place to prevent accidental releases of hazardous materials and adverse environmental impacts.
3. **Monitor and Treat Wastewater and Solid Waste:** APC has practices and policies in place to monitor wastewater and solid waste generated from operations, processes and sanitation facilities and controls such substances as required by law.
4. **Control and Treat Air Emissions:** APC adheres to all appropriate Federal and State regulations and standards as outlined in its Title V permits in the monitoring, control and treatment air emissions.
5. **Prevent Pollution and Waste:** APC makes reasonable efforts to reduce or eliminate waste of all types, including source reduction, recycling, and re-using materials and conservation of water and energy.
6. **Conserve Natural Resources:** APC makes reasonable efforts to acquire and use materials for production in a responsible manner which does not negatively impact the well-being of humans, animals, ecosystems, biodiversity, and other living systems.
7. **Calculate and Reduce Environmental Footprint:** APC calculates its scope 1 and 2 emissions carbon footprint using recognized methodologies.
8. **Minimize Packaging and Shipping Impact:** APC collaborates with its customers to identify methods to eliminate or minimize the amount of packaging used to ship products.

Business Conduct and Ethics

Suppliers must be committed to the highest standards of ethical conduct and fair business practices. Suppliers must:

1. **Not Accept Illegal Payments, Engage in Corruption, or Support of non-U.S. Sanctioned Boycotts:** Suppliers must adhere to the highest standards of moral and ethical conduct, prohibit illegal payment and corruption and comply with the U.S. Foreign Corrupt Practices Act. Extortion, fraud, bribery, kickbacks and embezzlement in any form must be strictly prohibited.
2. **Comply with Antitrust and Competition Laws:** Suppliers must prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or that unreasonably reduce competition.
3. **Behave Ethically in General Contracting:** Suppliers must compete fairly and ethically for all business opportunities. Suppliers must ensure that all statements, communications, and representations to APC are accurate and truthful.
4. **Protect Intellectual Property:** Suppliers must respect and protect APC's intellectual property rights and maintain the confidentiality of trade secrets and other APC proprietary information. Proprietary information includes any information that is non-public or not easily determined or obtained by others.
5. **Operate with High Financial Integrity:** Suppliers must not make false, inaccurate, or intentionally misleading entries in the accounting books, records, or communication with external or internal auditors

related to APC and must maintain accurate books and records in compliance with generally accepted accounting principles.

6. **Avoid Conflicts of Interest:** Suppliers shall disclose to APC any situation that may appear as a conflict of interest. For that reason, suppliers must inform APC if an employee of supplier, or their family member, has a relationship with an APC employee who can make decisions which will affect supplier's business, or if an employee of APC has any interest of any kind to supplier's business.
7. **Minimize Gifts and Avoid Offers of Hospitality:** Suppliers must ensure that the acceptance or bestowing of any gift or offer of hospitality cannot be construed as an attempt to secure favorable treatment from or to supplier. Suppliers or any member of their family should not accept or bestow any type of gift or any offer of hospitality beyond that of nominal value.
8. **Prohibit Animal Testing:** Suppliers must ensure that they do not conduct, or cause third-parties to conduct, any animal testing on products, raw materials or components of finished products supplied to APC, unless such testing is necessary to meet the requirements of applicable laws or regulations.

Monitoring and Compliance

To ensure ongoing compliance, suppliers should establish and maintain an appropriate management and monitoring practice whose scope is related to the content of this Code.

1. **Audit and Assessments:** Suppliers should designate one or more of its management staff to be responsible for monitoring their factories, production facilities and compliance with this Code. APC may conduct announced or unannounced visits and/or have 3rd party monitor visits to ensure compliance with the Code.
2. **Corrective Action:** Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with the Code.
3. **Compliance:** Suppliers will keep all information necessary to document compliance with the Code. Suppliers are expected to self-certify each year that they have reviewed and ensured material compliance with the Code.
4. **Reporting Noncompliance:** Suppliers, their employees, or their subcontracts should report any questionable behavior by APC employees or by their suppliers employees or subcontracts. Reports can be filed with the below APC individual:

American Packaging Corporation
850 West James St
Columbus, WI 53925
Attention: CFO

ACKNOWLEDGMENT OF TERMS:

By signing below, I acknowledge, accept and agree that I have received, read and comply with APC's Code of Conduct (the "Code").

Signature: _____

Print Name: _____

Title: _____

Date: _____

Company Name: _____

Company Address: _____