

PRINTPACK SUPPLIER CODE OF CONDUCT

Printpack expects all of its suppliers to comply with the law and act ethically in their dealings. This Supplier Code of Conduct establishes minimum requirements for our suppliers worldwide. Suppliers will not violate this Code directly or indirectly through the use of subcontractors or other intermediaries. Working together, we can achieve great success by doing the right thing.

- 1. Forced Labor, Slavery and Human Trafficking.** Supplier shall not engage in or support human trafficking or use or support slavery or slave labor in its supply chain. Supplier shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment. If workers enter into employment agreements with Supplier, workers should do so voluntarily.
- 2. Child Labor.** Supplier shall not directly (or indirectly through the use of subcontractors) employ any children under 18 years of age unless legal and necessary and unless Supplier complies with the minimum employment age limit defined by national law where the person is working or by International Labor Organization (“ILO”) Convention 138, whichever is higher.
- 3. Diversity and Inclusion.** Supplier will hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual’s performance and ability to do the job (except as required under collective bargaining agreements). Supplier will not discriminate based on a person’s legally protected status where that person is employed.
- 4. Harassment and Abuse.** Supplier will provide a workplace free from harassment, which can take many forms, including sexual, verbal, physical or visual behavior that creates an offensive, hostile, or intimidating environment.
- 5. Safety and Health.** Supplier will (i) endeavor to provide safe working conditions, (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities.
- 6. Third-Party Representation.** Supplier will respect the decision of its employees to join and support a union as well as their decision to refrain from doing so where legally permitted.
- 7. Working Hours and Compensation.** Within the bounds of normal seasonal and other fluctuations in business requirements, Supplier will (i) maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms; and (ii) pay fair and timely compensation, including any required premium payments for overtime work.

8. **Disciplinary Practices.** Supplier will not use corporal punishment or other forms of mental or physical coercion as a form of discipline.
9. **Business Integrity and Anticorruption.** Printpack works diligently to conduct its business fairly, honestly and ethically and to comply with all applicable laws, and it expects the same behavior from its suppliers. Correspondingly, Printpack will not tolerate the giving or receiving of bribes by its officers, directors, employees, or anyone acting on its or their behalf. It does not matter whether the bribe is intended to benefit the individual, Printpack or some other person or entity.

Supplier: (a) will not (i) offer, promise, pay, provide or give, directly or indirectly, any money, bribe, or financial or other advantage to any officer, director, or employee of Printpack, or anyone acting on its or their behalf, for an illegal purpose (a “Bribe”); or (ii) offer, promise, pay, provide or give, directly or indirectly, any money, bribe, or financial or other advantage, or anything of value in connection with its dealings with Printpack (collectively, a “Consideration”) to a Public Official; and (b) will not respond to, and will immediately report to Printpack, any request for or offer of a Bribe that Supplier receives from an officer, director or employee of Printpack or anyone acting on its or their behalf, or any request for or offer of a Consideration by or from a Public Official. A “Public Official” includes any person who holds a legislative, administrative, regulatory, governmental or judicial position of any kind, whether employed, appointed or elected, or who exercises a public function, or is an official or agent of a government-owned enterprise, public organization or political party, or any other person acting in an official capacity for or on behalf of a government entity, public organization, political party or state-owned enterprise.

Supplier will promote honesty and integrity in its business conduct by raising ethical awareness among its employees and providing direction and education on ethical issues.

10. **Environment and Sustainability.** Supplier will work to continuously improve its environmental performance to reduce the environmental impact of its activities.
11. **Conflicts of Interest.** Employees of Printpack should act in the best interest of the Company. Accordingly, employees should have no relationship, financial or otherwise, with any Supplier that might conflict, or appear to conflict, with the employee’s obligation to act in the best interest of the Company. For example, Suppliers should not employ or otherwise make payments to any employee of Printpack during the course of any transaction between the Supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but Suppliers should take care that any personal relationship is not used to influence any Printpack employee’s business judgment. If a Supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or same or opposite sex domestic partner) to an employee of Printpack, or if a Supplier has any other relationship with an employee of Printpack that might represent a conflict of interest, the Supplier should disclose this fact to Printpack or ensure that the Printpack employee does so.

- 12. Reporting Obligation.** Suppliers who believe that an employee of Printpack, or anyone acting on behalf of Printpack, has engaged in illegal or improper conduct, including conduct prohibited under this Code, should report the matter to Printpack. Supplier can contact the Printpack Ethics & Compliance Officer or General Counsel at +1 404 460 7000 or utilize Printpack's web-based reporting service at: https://secure.ethicspoint.com/domain/en/default_reporter.asp , or call toll-free using the access codes that can be found on the EthicsPoint website. A Supplier's relationship with Printpack will not be affected by an honest report of potential misconduct.
- 13. Audit Rights.** Printpack reserves the right, directly or through third party auditors, to verify Supplier's compliance with this Code of Conduct and, upon request, Supplier shall certify in writing its compliance with either this Code of Conduct, or with Supplier's own Code of Conduct which includes substantially similar requirements. Supplier's failure to comply with a certification request or Supplier's violation of the requirements of this Code may result in termination of purchase orders, supply agreements and Supplier's relationship with Printpack.

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