NOVOLEX
SUPPLIER CODE OF CONDUCT
PACKAGING LEADERSHIP
Novolex is an industry leader in packaging choice, sustainability and innovation whose commitment to service and quality reflects decades of experience and customer focus.

OUR MISSION
The Novolex mission is to continue a tradition of leadership with brands that offer our customers added value, efficiencies and convenience with innovative and sustainable packaging technologies and expertise that can serve the entire spectrum of their operations today and in the future.

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WELCOME SUPPLIERS

Novolex® manufactures a variety of paper and plastic products for customers on a global scale. Our goal is to provide the highest quality most innovative and sustainable products that will meet diverse needs and expectations of our customers. Our ability to fulfill and sustain that commitment depends on the quality of the materials and services provided by our suppliers who we rely on every day to enable us to make our products and manage our operations. Our suppliers are an integral part of the Novolex family.

Fundamental to every aspect of Novolex operations is our pledge to conduct our business in an ethical and socially responsible manner. We hold our suppliers to the same standards. The Novolex Supplier Code of Conduct explains our expectations for the ways in which each of you – our valued suppliers – should conduct your business. From fulfilling global mandates to respect and protect human rights and conserve natural resources to ensuring your employees can perform their jobs in a safe and secure work workplace, we expect you to adhere to standards that will make us proud to have you as our business partner.

We’re confident that your efforts to apply the Novolex Supplier Code of Conduct will strengthen your business and establish a shared commitment to conduct business with integrity and in accordance with the highest ethical principles.

Sincerely,

Stan Bikulege

Chairman and CEO of Novolex
BEHAVING RESPONSIBLY

Novolex expects its directors, officers and employees to conduct themselves according to the highest ethical standards. In doing so we strive every day to fulfill our commitment to respect human rights, ensure safe working conditions for our employees and protect the environment and the communities in which we do business. These efforts are crucial to our success and to the success of our stakeholders.

We expect similar behavior from our suppliers, vendors and other third-party relationships (hereafter “suppliers”) starting with a commitment from them to abide by all applicable laws and regulations as well as widely recognized international guidelines. We have incorporated these concepts into the Novolex Supplier Code of Conduct (hereafter the “Code”).

In establishing the Code, we recognize that no code can anticipate all possible situations. Therefore, we call on our business partners to abide not only by the letter but also spirit of the Code and to use sound judgment in order to behave in a socially responsible manner at all times. Such efforts will benefit not only your daily operations and ours but also protect our most valuable assets, the thousands of our employees and their families who rely on us every day for their livelihood.

The Code is not intended to supersede or modify terms and conditions of existing contracts. In the event there appears to be a conflict between provisions of the Code and the terms and conditions of a contract, please contact us.

Contact Us

For questions or comments about the Novolex Supplier Code of Conduct, please contact us at sustainability@novolex.com or 800-xxx-xxxx
Human Rights

Novolex expects our business partners to treat all individuals with respect and dignity including undertaking efforts to promote diversity, inclusion, and socially responsible best practices.

Prohibitions on Child Labor

• Suppliers shall not employ individuals under the age of 18 or below the legal minimum age of the country in which they operate, whichever is lower.

Human Trafficking and Forced Labor

• Suppliers shall not use forced labor or employer workers procured through the use of human trafficking and must adhere to all laws and regulations designed to prevent such practices. Such laws and regulations include the UK Modern Slavery Act of 2015 and The California Transparency in Supply Chains Act.

Freedom of Association

• Suppliers shall honor employee rights to bargain collectively regarding terms and conditions of employment and refrain from violating collective bargaining rights within the country in which they operate.

Wage and Benefits

• Suppliers shall pay employees not less than the minimum wage as defined by local ordinances and provide at least the minimum level of benefits stipulated by local laws and regulations.
• Employees must be paid for all hours worked and, if applicable, receive overtime compensation as legally required within the country and local jurisdiction in which the work is performed.
• No employee shall receive deductions from wages unless he or she has consented to do so in writing and in accordance with local law.
Human Rights

Anti-discrimination and Fair Treatment

• Suppliers shall refrain from adversely affecting employees who are members of a protected class as defined by the country or local jurisdiction in which the business operates.

Employee Grievance Mechanism

• Suppliers shall provide employees with a grievance mechanism which can be used to report concerns related to discrimination, harassment or unfair treatment.
• The grievance mechanism should ensure employee concerns are treated confidentially and can be communicated without fear of retaliation.

Immigration Compliance

• Suppliers shall confirm a pending employee’s proof of his or her ability to work legally within the country.
• Suppliers shall never knowingly employ individuals who do not have proper documentation to work within the country in which they operate.

Whistleblower Protection

Suppliers are expected to provide their employees with avenues for raising legal or ethical issues or concerns in confidence and without fear of retaliation. Suppliers shall prevent, detect and correct any retaliatory actions should they occur.
Environment

**EHS Compliance, Management Systems and Record Keeping**

- Suppliers shall comply with all laws and regulations pertaining to environment, health and safety (EHS) practices.
- Suppliers should utilize EHS management systems in line with industry practices. EHS management systems and best practices may include, but not be limited to, preventive maintenance procedures, use of personal protective equipment, training and compliance self-assessments and audits.
- Suppliers must maintain all required permits and records pertaining to EHS practices within the country in which they operate and retain those records for the duration required.
- Compliance self-assessment or audits should be completed in line with industry best practices and audit records retained for a minimum of three (3) years or the duration required by regulation, whichever is longer.

**Wastewater and Solid Waste**

- Suppliers must have a mechanism to identify wastewater and solid waste produced from operations and should evaluate strategies to reduce levels in the future wherever possible.
- Suppliers are encouraged to employ strategies to recycle to the extent possible waste produced during the manufacturing process.

**Pollution Prevention and Resource Reduction**

- Suppliers are encouraged to track and analyze energy use and identify opportunities to increase efficiencies.
- Suppliers are encouraged to apply strategies to develop carbon footprint reduction strategies.
- Suppliers are encouraged to provide employees with recycling opportunities.
Health and Safety

Novolex expects suppliers to protect the health and safety of their employees and independent contractors by providing the training needed to perform their work safely, making personal protective equipment available and ensuring emergency response resources are available in the event of a health or safety incident.

Training and Equipment

- Employees must receive adequate health and safety training conducted annually as mandated by local law.
- Suppliers must maintain safety training records for the duration of employment of active employees if required by regulation.
- Suppliers must provide employees and independent contractors with personal protective equipment that will protect them from exposure to hazards.
- Suppliers must ensure that personal protective equipment meets specifications of local laws in the country in which they operate.

Emergency Response and Record Keeping

- Suppliers are encouraged to select and train emergency response teams, duly certified as required by regulation, and ensure employees are able to identify emergency response team members on their shift or at their work station.
- Suppliers must respond to and investigate reported safety-related incidents or complaints.
- Suppliers are expected to maintain incident and close call reporting documentation as required by regulation.
Anti-corruption and Fair Competition

Novolex expects its suppliers to comply with anti-corruption and fair competition laws and regulations to prevent engaging in activities that could eliminate, diminish or discourage competition.

Gifts and Entertainment

- Suppliers should never offer, promise, authorize, make, solicit or accept bribes, kickbacks or other improper payments, regardless of local practice or perceived customs. This applies to interactions with any persons, whether in the private or public sector.
- Suppliers must not give or receive extravagant meals, gifts or entertainment. Values should be reasonable and modest and within acceptable limits appropriate to the business relationship and be made in a transparent manner.
- Suppliers must be especially cognizant of interactions with government officials, including employees of state-owned enterprises that can present heightened risk and not make facilitating payments to expedite or secure non-discretionary routine governmental processes.

Political and Charitable Activities

- Lobbying is an appropriate way for companies to educate policymakers about legitimate corporate interests. Suppliers should conduct any such activities in accordance with applicable laws and not purport to represent the views of Novolex.
- Suppliers must be cognizant of possible risks associated with charitable contributions particularly when solicited by or made to organizations with affiliations to Novolex customers or suppliers.

Antitrust, Sales Practices and Competitive Information

- Suppliers shall not engage in transactions that violate antitrust or competition laws. Such transactions may include but not be limited to participating in cartels, price fixing, bid rigging or information sharing that could prejudice fair competition in the marketplace.
Data Protection and Information Security

Novolex expects its suppliers to protect data and other information obtained in the course of business.

- Suppliers shall take appropriate steps to protect proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.

Conflict and Violations

If there is a perception that the Code conflicts with a Novolex contract or a conflict arises in a supplier’s ability to comply with international, national and local laws and regulations or voluntary standards, suppliers should contact Novolex in writing.

In the event that provisions of this Code are not met, Novolex reserves the right to reevaluate our relationship with the supplier. This may result in corrective action, including termination, of the contract.

Novolex Auditing Process

Novolex reserves the right to impose scheduled or for-cause audits. Novolex will provide the supplier with a 30-day notice for a scheduled audit. Novolex defines a for-cause audit as an audit that is required because Novolex has a reasonable belief that the Code has been violated. In the event of a for-cause audit, Novolex may not provide advance notice. All costs associated with audits will be charged back to the supplier.
**Supplier Affirmation**

The Novolex Supplier Code of Conduct is a vital component of the partnerships we have with our suppliers. As such, suppliers will be asked to affirm that they support the Code.

**Ethics and Compliance Helpline**

Suppliers and their employees may use the Novolex Ethics and Compliance Helpline to report suspected violations of the Novolex Supplier Code of Conduct. All reports remain anonymous and may be made without fear of retaliation.

To make a report online visit:


The online reporting portal can also be reached by visiting www.novolex.com.

To make a report by telephone 24/7 and speak to a specialist in multiple languages, use the following phone numbers:

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<th>Country</th>
<th>Phone Number</th>
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<tr>
<td>USA, CANADA, MEXICO</td>
<td>1-888-852-6208</td>
</tr>
<tr>
<td>CHINA</td>
<td>(China Telecom South) 10-800-110-1304</td>
</tr>
<tr>
<td></td>
<td>(China Netcom Group) 10-800-711-1384</td>
</tr>
<tr>
<td>IRELAND</td>
<td>(UIFN) 00-800-222-55288</td>
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<tr>
<td></td>
<td>Ireland 1-800-550-000</td>
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<tr>
<td></td>
<td>At the English prompt dial 844-330-7089</td>
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<tr>
<td>NETHERLANDS</td>
<td>0800-022-9111</td>
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<tr>
<td></td>
<td>At the English prompt dial 844-330-7089</td>
</tr>
<tr>
<td>UNITED KINGDOM</td>
<td>0800-032-8483</td>
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