

Supplier Standards

TOPPAN Packaging Americas Holdings Inc. - Supplier Code of Conduct

Strategic Mission Statement

Be the global leader in providing customer-preferred packaging solutions to selected value-added segments, where we expect to be either number one or two in market share. Shareholder return, customer and employee satisfaction, commitment to excellence, integrity, environmental stewardship, and a safe workplace will continue to be the hallmarks of our culture.

Since the conduct of our suppliers can be a direct reflection on TOPPAN and our reputation, we require that our suppliers, and any of their contractors, accept the Supplier Standards as detailed below prior to conducting business with the Company. TOPPAN shall work with suppliers to implement and, at our discretion, monitor these standards through on-site audits.

Code of Conduct

Suppliers shall be aware of, and abide by, TOPPAN's [Policies on Business Conduct and Ethics](#) with special attention towards the sections on anti-trust, illegal payments and retaliation. If you need a copy of this code of conduct, please see your Supply Management representative.

Environmental Awareness

TOPPAN's focus on sustainability is directly linked to and in support of its mission statement. We believe that initiatives around enhancing our reputation, being a strong corporate citizen, providing a good place to work and being a good steward of our environmental resources will make us a stronger, more competitive company, better able to support and satisfy our broad customer base and provide shareholders with average annual double-digit total returns.

Sustainability

In today's competitive global marketplace, the issues relevant to supporting sustainability are directly linked to TOPPAN's long-term profitability and viability. We believe that sustainability and business success are not only compatible but are also inextricably linked and that by embracing both, we will benefit our shareholders for the long term.

TOPPAN's commitment to the sustainability statement outlined above is an integral part of our identity and how we operate. As such, we expect all our suppliers to support these same principles. Specifically, TOPPAN expects its suppliers to develop sourcing methods, goals, and reporting for, and to make efforts to control and reduce, key sustainability metrics including greenhouse gases (GHGs), water and energy consumption, solid waste, volatile organic compound (VOC) and hazardous air pollutant (HAP) production. Suppliers shall demonstrate leadership in mindful use of plastics while increasing the recyclability of packaging material supplied. Suppliers shall also contribute to recyclable product collection, sorting, and solutions to mitigate plastics and/or other products ending up in landfill or as litter. All suppliers shall make reasonable efforts to pursue these objectives and cooperate reasonably with TOPPAN's efforts in this respect.

Environment

Suppliers accept that they have an ethical responsibility to protect the environment in which they operate and will conduct all business in accordance with all local and national laws and regulations in the jurisdictions in which they operate.

Social Responsibility

Non-Discrimination

TOPPAN is an Equal Opportunity Employer committed to providing its employees with a safe, nondiscriminatory work environment that promotes open and honest communication and embraces dignity, respect, and diversity in all aspects of its business operations. TOPPAN does not tolerate discrimination. Suppliers shall make it a priority to bring diversity and inclusivity to suppliers' businesses and hiring practices by treating all of the suppliers' employees (current and potential), stakeholders, and communities fairly, regardless of one's race, gender, ethnicity, age, physical ability, religion, or sexual orientation. This statement is not limited to these statuses, but to all statuses one may have.

Supplier shall not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Supplier shall ensure harassment is not tolerated in the workplace and in any work-related circumstances outside the workplace.

Diversity

Suppliers are expected to develop sourcing methods, goals, reporting, and efforts to encourage their use of minority, LGBT, Veteran, Disabled, and women-owned suppliers or other historically disadvantaged suppliers. Each supplier shall use commercially reasonable efforts to engage such sub-suppliers. If requested, suppliers shall report to TOPPAN the amount of such sub-supplier spending quarterly.

Fundamental Human Rights

Human Rights Policy

Respect for human rights is a basic tenant of TOPPAN's beliefs and is consistent with our values and our goal to be a more economically, socially, and environmentally sustainable Company. Our approach to human rights begins with understanding how our activities, including our products and services, as well as the activities of our business partners, may impact, either positively or negatively, our employees, communities, and partners.

TOPPAN operates in diverse cultures and communities. Wherever we operate, certain principles consistently apply to the Company's relationships with its employees and its expectations of conduct in the workplace. To achieve this, we support and respect international human rights norms, including the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and treaties pertaining to labor rights, such as those related to wages and working hours. TOPPAN Holdings is a signatory to the United Nations Global Compact, and the TOPPAN Group supports its Ten Principles as well as the Guiding Principles on Business and Human Rights. Our practices are based on these principles:

- Fair and safe work
- Rights of children and abolition of child labor
- Prohibiting forced or compulsory labor and human trafficking
- Non-discrimination
- Freedom of Association and collective bargaining

TOPPAN and its affiliates support these principles. The Company and its affiliates develop and implement suitable policies, procedures, and practices considering applicable laws and specific circumstances to accomplish the objectives listed above.

TOPPAN's full [Human Rights Policy Statement](#) is posted on TOPPAN's website.

Elimination of Forced or Compulsory Labor and Human Trafficking

TOPPAN opposes the use of forced or compulsory labor, including prison labor, indentured labor, or modern forms of slavery and any form of human trafficking. Suppliers shall recruit their employees and provide working conditions, including payment of wages and benefits, that comply with applicable laws and regulations. No supplier employee may be compelled to work through force or intimidation of any form.

Relationships with Indigenous People

Within the framework of our values, we respect the cultures, customs, and values of the people in communities where we operate and consider their needs, concerns, and aspirations. TOPPAN fully respects and actively protects their traditions and the connection they may have to the land and water sources present in areas TOPPAN may operate.

Implementation

Our Human Rights Policy Statement is implemented through the Company's business ethics and compliance program, including annual training provided to all employees on how to implement this policy in the scope of their employment, and the policy will remain posted on TOPPAN's website at [TOPPAN Group Human Rights Policy | TOPPAN Holdings Inc.](#)

Human Rights Policy is overseen by the TOPPAN Board of Directors and the manager in charge of the Personnel & Labor Relations Division is responsible for its implementation. Day-to-day efforts related to human rights are led by the Personnel & Labor Relations Division, the Manufacturing Management Division, and the Legal Division, in collaboration with related departments throughout the TOPPAN Group.

Labor

Fair and Safe Work

TOPPAN believes workers should be treated with dignity, respect, and fairness and should not be subject to harassment, discrimination, forced labor, or inhumane treatment. Suppliers will compensate employees

competitively relative to the industry and local labor market, and in accordance with the terms of applicable collective bargaining agreements.

Suppliers will work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws. Suppliers will work continuously to provide a safe, inclusive work environment for employees and contractors in line with the international labor standards wherever the supplier does business.

Employees shall be fairly compensated through wages and benefits which meet or exceed any prevailing local standards and are in compliance with local and national laws and regulations of the jurisdictions in which the suppliers are doing business.

Hours of Labor

Suppliers shall operate such that employee working hours are in compliance with local standards and local and national laws and regulations of the jurisdictions in which the suppliers are doing business. TOPPAN will not work with any suppliers who require employees to work in excess of the statutory limitations without proper compensation as required by applicable law. Employees should be permitted reasonable days off and leave privileges.

Immigration Law and Compliance

Suppliers will only utilize or benefit from workers with a legal right to work in the jurisdictions in which suppliers are doing business.

The Rights of Children and Abolition of Child Labor

TOPPAN condemns all forms of exploitation of children and forbids the use of children in our workforce. Suppliers will not recruit child labor and supports the elimination of exploitative child labor practices. All supplier employees are required to be above the legal employment age in the country of their employment. Supplier will also support laws duly enacted to prevent and punish the crime of sexual exploitation of children and will cooperate with law enforcement authorities in these matters. Suppliers may encourage the creation of educational, training or apprenticeship programs tied to formal education for young people, with appropriate policy governance and oversight.

Work Environment

TOPPAN's Guiding Principles

TOPPAN is committed to our employees and strives to promote our corporate values of: Integrity, Respect, Service, Teamwork, and Accountability. This begins with creating a hospitable work environment for all employees. It is the Company's expectation for suppliers to promote a safe and respectful work environment for employees and emphasize high priority of TOPPAN's corporate values.

Anti-harassment and Abuse

Suppliers shall ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct. Suppliers shall not threaten workers with, or subject them to, harsh or inhumane treatment, including, but not limited to, mental or physical coercion and sexual harassment.

Grievance Process

Suppliers shall provide a grievance process for employees to identify workplace concerns to management.

Employee Safety

TOPPAN's Safety Policy

It is the policy of the Company to provide a safe and healthful work environment for the protection of its most vital resource—TOPPAN employees. The safety of employees shall be of the greatest interest to all levels of management and supervision, ranking in importance above production, quality, costs, and service. The Company's basic philosophy is that all personal injuries can and must be prevented. Suppliers are expected to work towards a Zero-Injury Work Environment. Any and all hazardous working conditions shall be eliminated, as personal safety of all workers remains a priority.

While the responsibility for safety begins and ends with the president, that responsibility is shared throughout the organization. Division vice presidents are responsible for their divisions, plant managers for their plants; supervisors are accountable for the safety of their own groups; and all individuals are accountable for their own safety. There will be no place in the organization for an unsafe employee. All employees at every level are expected to fully accept responsibility for their own safety and for the safety of those with whom they work.

Suppliers shall maintain a vigorous safety and injury prevention program at each supplier location and will allocate the necessary resources to assure a safe and healthful work environment for employees.

Suppliers shall abide by all local, state, federal, and international laws. At any time that a supplier's employees or agents are in a TOPPAN facility or in proximity to TOPPAN's employees, the supplier shall require its employees or agents to comply with TOPPAN's policies and requirements regarding the presence of supplier's employees or agents on TOPPAN's premises, including passing applicable background checks. Suppliers shall follow, and cause their employees and other agents to follow, TOPPAN's policy that being under the influence of, bringing in, possessing, providing, manufacturing or other production of, buying, selling, or using alcoholic beverages, unauthorized drugs or controlled substances, or possessing weapons, on TOPPAN's property or in TOPPAN's vehicles, is strictly prohibited.

Product/Service Assumptions

Quality

Suppliers shall take due care to ensure their work product meets TOPPAN's quality standards. Suppliers shall have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

Verbal Communications

Suppliers shall be aware that oral commitments of any kind, including modifications and supplements to terms and conditions of purchase, must be confirmed in writing by TOPPAN to become effective.

Delivery

Suppliers shall adhere to agreed periods and dates previously set for deliveries. Time is of the essence in performing deliveries. Should suppliers experience or anticipate any delay in performing deliveries, suppliers shall immediately notify TOPPAN of such delay, its expected duration, and the reasons thereof. Neither such notification nor an acknowledgment by TOPPAN will constitute a waiver of a specified delivery schedule. The delivery schedule will not be modified unless the parties do so in writing.

Quantity Integrity

Suppliers agree that if questions of delivery quantities arise, the values and procedures established by TOPPAN during incoming goods inspection will be used as the absolute quantity after comparisons with the supplier's records. This includes but is not exclusive to quantities, weights, and measurements.

Business Continuity

Supplier shall be subject to the terms of any specific contractual provisions that apply. Suppliers shall have adequate business continuity plans in place to continue to provide services to a reasonable degree in the aftermath of any kind of operational crisis, whether it is caused by a natural disaster, equipment malfunction, power failure, terrorist act or so forth. Upon request of TOPPAN, suppliers shall disclose and discuss in reasonable detail the elements of its business continuity plan.

In addition to complying with our security requirements, suppliers are encouraged to implement practices and procedures to ensure the security of their people, property, and other assets, including their supply chain. Suppliers are encouraged to participate in the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

Data and Web Presence

Cybersecurity

Suppliers shall take care to safeguard and protect information entrusted to them, as well as information generated or developed by them, from unauthorized access, destruction, use, modification, or disclosure. Suppliers are encouraged to maintain risk-based cybersecurity programs designed to mitigate emerging threats to their information systems, products, services, and supply chain while complying with all applicable contractual and legal requirements.

Suppliers shall take appropriate steps to safeguard any information that could lead to the identification of individuals (“Personal Information”), including information that identifies individuals in combination with other information. Suppliers should develop and maintain key cybersecurity controls designed to protect the confidentiality, integrity, and availability of information assets within their operations. These controls should include the protection of information assets against malware, the education and training of personnel on cyber topics, monitoring of technology environments for cyber-related events, and providing for business continuity and resiliency following a cyber-attack or technology failure. Suppliers shall process and protect the personal information of TOPPAN personnel and other third parties in accordance with all applicable laws and regulations while using this information only for intended business purposes.

Social Media

Suppliers shall educate and train employees on the use of social media, which should be broadly understood to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social

networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. Such education and training must include that supplier employees must not give the impression that they are speaking on behalf of TOPPAN or misrepresent or disparage TOPPAN in any combination or online user forums.

Although it is not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment. Any request to publish TOPPAN related content or images must go through a request and review process that can be initiated by contacting your Supply Management representative.

Ethical Business Conduct

Anti-Bribery and Foreign Corrupt Practices Act

TOPPAN requires that all suppliers adhere to the Company's full [Anti-Bribery and Foreign Corruption Practices Act Policy](#).

This policy sets forth TOPPAN's expectation of full compliance with the Foreign Corrupt Practices Act ("FCPA") and all other applicable anticorruption laws in effect wherever the Company does business. It is to the Company's expectations that all suppliers adhere to this policy in application to all operations of the supplier's business practices around the globe, including all divisions, subsidiaries, and affiliated companies. This policy applies to all employees, directors, officers, agents, consultants, representatives, distributors, and joint venture partners (all deemed to be "Supplier Representatives") of the supplier.

It is the unalterable policy of TOPPAN to conduct Company business legally and ethically, including fully complying with the provisions of the FCPA and all similar laws. Compliance with this policy is mandatory. No Supplier Representative has the authority to act contrary to the provisions of this policy.

Responsible Minerals Procurement

TOPPAN requires suppliers that provide us with tantalum, tin, tungsten or gold, or products containing these components, which are then incorporated into products we manufacture for sale, to submit information to us that allows us to trace the minerals back through the supply chain. Following the Company's [Fair Business and Ethics \(5-7\) Responsible Minerals Procurement](#), we expect our suppliers to adopt policies and establish their own due diligence programs to ensure conflict free supply chains, and to provide us only with minerals or products that are conflict free. If we become aware of a supplier whose supply chain includes minerals

that are not conflict free, we will take appropriate steps to remedy the situation in a timely manner, including reassessment of the supplier relationship. We expect our suppliers to take similar measures with their suppliers.

Tax Policy

TOPPAN's primary objectives are to protect our stock value for our shareholders and to comply fully with all legal and regulatory obligations. In accordance with TOPPAN's Tax Policy, it is the expectation that the supplier acts with integrity in all tax matters and shall engage only in reasonable tax planning that is aligned with commercial and economic activity and does not lead to an abusive result.

Fair Competition

Suppliers must not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations, or any other prohibited conduct that limits free and fair competition.

Conflict of Interest

Suppliers shall avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with TOPPAN. Suppliers shall provide notification to affected parties if an actual or potential conflict of interest arises, including conflicts between the interest of TOPPAN and the personal interest of a supplier's employees or those of close relatives, friends, or business associates of a supplier or its employees. Any concerns should be addressed to your Supply Management representative.

Gifts & Business Courtesies

We compete on the merits of our products and services and do not use the exchange of business courtesies to gain an unfair competitive advantage. We expect the same of our suppliers in the offering or receipt of any gift or business courtesy, including cash and cash equivalents. Note that our employees who are in any way involved in procurement decisions are subject to even more strict limitations and may not accept any business courtesies, with the exception of very low-value promotional items. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of TOPPAN.