



Supplier Code of Conduct

Signode Industrial Group, a collection of legal entities including their business units that are parent companies, subsidiaries, so-called brother/sister concerns, affiliates or joint ventures of each other and operate collectively in the global industrial packaging business segment under the common umbrella "Signode Industrial Group" or the "Transit Packaging Division" of Crown Holdings, Inc. (collectively, "Signode"), is committed to acting ethically and responsibly in all facets of our operations. Signode's Statement of Principles of Conduct (the "Signode Code"), which applies to Signode's directors, officers and employees, governs its own conduct. In that document, Signode commits to follow the words, as well as the spirit, of the law in the countries where it operates and requires all its employees to strive to adhere to the highest standards of ethics, morality, honesty and decency in the performance of their duties.

This Supplier Code of Conduct (the "Supplier Code"), which is informed by the Signode Code and other important public principles such as the United Nations Global Compact, is designed to align the ethical objectives and conduct of all of Signode's suppliers, all over the world, with the standards that Signode applies to its own personnel. Signode expects each supplier to comply with the principles described below, or comparable provisions of its own code of conduct, in all its dealings with Signode.

Sustainability is a basic value at Signode. One key driver of this Supplier Code is to ensure that our suppliers understand and are aligned with our sustainability values. We encourage our suppliers to continuously work to implement sustainable development principles like the ones in this Supplier Code in their own operations and in their supply chain.



To Whom Does This Supplier Code Apply?

A Signode supplier is any third party with whom Signode has an active commercial relationship for the supply of goods or services, which includes suppliers of raw materials and machinery, suppliers of other goods and services, contractors, consultants, brokers and agents.

Signode reserves the right to add to or modify this Supplier Code from time to time. Suppliers are expected to comply with the latest version of this Supplier Code that is posted on Signode's website at www.signode.com/Suppliers or otherwise provided directly to them.

The Principles of the Supplier Code

All suppliers must adhere to the following principles:

Compliance with Law

Suppliers must comply with the words and spirit of all applicable laws, rules, regulations and orders of all government bodies in the performance of their business.

Human Rights/Employment Practices/Health & Safety

Signode expects its suppliers to support and respect the protection of human rights and ensure they are not complicit in human rights abuses. Signode expects its suppliers to follow universally-accepted employment practices and to prioritize health and safety.



Signode requires the following:

Suppliers shall not employ anyone under the legal working age.

Suppliers shall not permit the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.

Suppliers shall provide a workplace free from harassment, including sexual, verbal, physical or demonstrative behavior that creates an offensive, hostile or intimidating environment.

Suppliers shall not discriminate against current or prospective employees on grounds of race, ethnicity, color, national origin, ancestry, nationality, citizenship, religion, age, gender (including gender identity or expression), sexual orientation, disability, genetic information, uniformed service, veteran's status or any other characteristic protected by applicable law, ordinance or regulation.

Suppliers shall endeavor to provide a safe work environment in compliance with all applicable laws or, in the absence of applicable laws, best industry practices. Suppliers shall take actions to minimize accidents, injury and illness during the course of work.

Suppliers shall recognize the rights of freedom of association and collective bargaining under applicable law.

Suppliers shall comply with all applicable labor laws, including those related to wages, overtime, vacations, absences, disability, maximum working hours and legal right to work.

Environment

At Signode, environmental commitment is a fundamental part of our business philosophy. Signode recognizes that the protection of human health and the environment is a sound business practice that conserves resources and safeguards employees, customers, the general public and the environment. Any responsible enterprise should consider the potential environmental impacts of daily business decision-making processes along with opportunities

for conservation of natural resources, source reduction, material recycling, and pollution control to ensure cleaner air and water and the reduction of landfill wastes. Signode requires its suppliers to conduct business in accordance with all applicable environmental laws and highly recommends that its suppliers adopt sustainable practices in the conduct of their operations so as to conserve natural resources and minimize their environmental impact.

Business Integrity and Anticorruption

In support of Signode's values of ethics, morality, honesty and decency in its work, Signode requires the following of its suppliers:

Antitrust/Competition Law Compliance – Suppliers will fully comply with the antitrust and competition laws of the countries in which they do business. For example, suppliers will not engage in collusive bidding, price fixing, price discrimination or any other unfair trade practices in violation of applicable antitrust and competition laws.

Anti-Bribery/Anti-Corruption – No Signode employee or third party acting on behalf of Signode may pay, offer or promise to pay, or authorize payment to any party, public or private, in any country, in order to secure an improper benefit for Signode. Nor may they accept or solicit such payment. Suppliers shall not engage in any improper payments, offers or solicitations to Signode personnel. Reasonable, noncash gifts having a token or nominal (modest) value, as well as reasonable meals and entertainment for legitimate business purposes, are acceptable provided they are not intended and cannot be construed as bribes, kickbacks or other forms of compensation to the Signode recipient. The giving to any Signode personnel of any cash gift (including cash equivalents such as gift cards, stocks or bonds) or any personal loan is strictly prohibited regardless of value.

Conflicts of Interest – Signode's personnel are expected to act always in the best interest of Signode and to avoid personal, business or other conflicts of interest. Signode expects its suppliers to support this requirement by immediately reporting to Signode any actual or potential conflict of interest that may arise in our relationship.

Confidentiality – Suppliers who receive information from or on behalf of Signode on a confidential basis shall maintain that confidentiality and shall use the information only in the performance of their obligations to Signode.

Intellectual Property Protection – Suppliers shall respect the intellectual property rights of Signode and others and comply with their legal and contractual obligations to Signode with respect to the protection of all intellectual property provided to them by or on behalf of Signode.



International Trade – Suppliers shall assist Signode by complying with all trade laws applicable to Signode in the performance of their obligations. Those trade laws include US Anti-Boycott Laws as well as US and EU trade sanctions laws, export controls laws, import laws and laws regarding supply chain security.

Data Protection – Suppliers shall respect privacy rights and comply with all applicable laws relating to data protection and data security.

Origin Mapping – Suppliers must be capable of disclosing potential sources of primary origin associated with the products or services provided to Signode. If requested by Signode, suppliers will provide supply chain mapping back to the origin. This obligation applies to, for example, conflict minerals covered by applicable U.S. law. Signode expects suppliers to advise Signode if their products contain conflict minerals as defined in U.S. law.

Financial Controls – Suppliers shall maintain strong financial controls and keep complete and accurate records of all business operations and transactions involving Signode in accordance with applicable retention policies and laws. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited.



Continuous Improvement

Striving for excellence and continuous improvement is an important facet of how Signode conducts business. Signode encourages and recommends suppliers to:

Continuously improve their products and/or services so as to improve quality, reduce cost and reduce the impact of their products on the environment.

Maintain accurate supply chain records.

Identify, set targets and implement action plans for reducing environmental impacts in the areas of water, wastewater, energy, greenhouse gas emissions, waste, landfill use and packaging.

Strive to reduce their environmental footprint, commit to continuous improvement on sustainability issues, and support the achievement of the goals of Signode's sustainability program.

Source raw materials from sustainable sources where compatible with the needs of Signode's production processes.



Accountability & Compliance

Signode recommends that suppliers implement appropriate policies, management systems, procedures and staffing to meet the expectations of this Supplier Code. Signode expects suppliers to effectively communicate to its personnel the standards to which the supplier is committed, as well as relevant laws, regulations and protections.

Signode reserves the right to require proof of compliance with this Supplier Code (or the equivalent provision of a supplier's code of conduct), which Signode may require in the form of a certification of compliance, a review of the supplier's supporting documentation and records or other appropriate evaluative format. If the supplier is not in compliance, Signode reserves the right to review the non-compliance with the supplier and require the supplier to take corrective measures to cause compliance.

Nothing in this Supplier Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code and any other provision of a particular contract, the contract provision will control.

Suppliers may address questions regarding this Supplier Code of Conduct to Signode's Legal Department at LegalNotices@signode.com and report violations via email (LegalNotices@signode.com), via Signode's ethics and compliance website/portal (www.SIGhelpline.ethicspoint.com) or by telephone 1-855-866-2925 (in the US/Canada) or visit www.signode.com/Suppliers for a list of international telephone number options.

Signode Industrial Group

Transit Packaging Division of
Crown Holdings, Inc.

