



LEGAL & COMPLIANCE POLICY

Conflict Minerals Policy

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Index

1. Introduction	2
2. Purpose	2
3. Scope of Application	2
4. Definitions	3
5. Reference Materials	4
5.1. Related Sonoco Policies	5
5.2. Laws, Regulations, and Guidance	5
6. Policy Statements	5
6.1. Due Diligence Processes Identifying Risks	5
6.1.1. Assessing Product Lines	5
6.1.2. Gathering Supplier Data/Supplier Engagement.....	5
6.1.3. Assessing Supplier Data	6
6.1.4. Continual Evaluation	6
6.2. Supplier Noncompliance.....	6
6.3. Reporting Process and Timing	6
6.4. Training	7
7. Enforcement.....	7
8. Questions	7

1.Introduction

The Securities and Exchange Commission (SEC), as required by the Dodd-Frank Act, requires publicly traded companies to annually conduct a good faith reasonable inquiry to determine whether any conflict minerals (generally, columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives (tantalum, tin, and tungsten)) necessary to the functionality or production of products manufactured by the company or contracted to be manufactured by the company originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country, or are from recycled or scrap sources. The results of the inquiry are required to be disclosed annually in a report on Form SD, a Specialized Disclosure Report filed with the SEC.

Sonoco Products Company (collectively “Sonoco” or the “Company”) makes good faith efforts to ensure that any conflict minerals necessary to the production or functionality of their products are responsibly sourced. As some of Sonoco’s products may contain conflict minerals, Sonoco conducts due diligence on its supply chain and reports on these efforts annually. Because Sonoco does not purchase these minerals directly from mines or smelters, the data underlying Sonoco’s reports relies on source information provided by Sonoco’s suppliers. Sonoco executes a program to carry out supply chain due diligence informed by guidance issued by the Organization for Economic Co-operation and Development (OECD), which the SEC has recognized as an internationally recognized due diligence framework appropriate for use in this context.

2.Purpose

This Conflict Minerals Policy (the “Policy”) is intended to inform stakeholders of steps Sonoco takes that are designed to achieve, and which are reasonably expected to achieve, compliance with Rule 13p-1 under the Securities Exchange Act of 1934 and encourage the responsible procurement of conflict minerals.

The Policy does not indicate that Sonoco intends to altogether ban the use in its products of tantalum, tin, tungsten or gold that originate in conflict-affected and high-risk areas, but Sonoco is committed to the responsible sourcing of conflict free minerals. Sonoco recognizes that avoiding the sourcing of any of these minerals from these areas would cause a de facto embargo with potentially serious adverse impacts on the living conditions of local populations. However, this Policy sets forth Sonoco’s strong commitment to the responsible sourcing of conflict free minerals.

3.Scope of Application

The Policy applies to all employees in all countries where Sonoco does business. Newly acquired businesses will be required to comply with this Policy within the integration timelines defined by applicable regulatory bodies, including the SEC. Additionally, the Policy is made available to all suppliers with the expectation that suppliers will comply

with the Policy. Sonoco's supplier contracts and purchase orders include a clause requiring Sonoco's suppliers to disclose whether conflict minerals are used in the manufacture or production of any products they supply to the Company, and to provide additional information to Sonoco about sourcing if requested.

4. Definitions

- 4.1. **Conflict Minerals** – As defined by the SEC, conflict minerals include “[c]olumbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten” that have been determined by the Secretary of State to be financing conflict in the DRC or an adjoining country.
- 4.2. **Conflict Minerals Report** – A required disclosure that companies must file with the SEC as an attachment to the company's Form SD filing. This must be filed if the company knows or has reason to believe that its conflict minerals may have originated in the “Covered Countries” and knows or has reason to believe its conflict minerals may not be from recycled or scrap sources.
- 4.3. **Covered Countries** – The DRC or any other country that shares an internationally recognized border with the DRC (as of the effective date of this policy, Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).
- 4.4. **Dodd-Frank Act** – Broad congressional legislation that requires increased transparency and improved pricing in the derivatives marketplace. Regulations promulgated pursuant to Section 1502 require companies that file reports with the SEC under the Securities and Exchange Act to disclose their use of tantalum, tin, tungsten, and gold (3TG) conflict minerals where any 3TG conflict minerals are considered “necessary to the functionality or production” of their products.
- 4.5. **Organization for Economic Co-operation and Development (OECD)** – An international organization that works to build better policies through establishing evidence based international standards to social, economic, and environmental challenges.
- 4.6. **OECD Due Diligence Guidance** – According to the OECD website, the [guidance](#) provides step-by-step management recommendations endorsed by governments for global responsible supply chains of all minerals, in order for companies to respect human rights and avoid contributing to conflict through their mineral or metal purchasing decisions and practices. Sonoco's supply chain due diligence program was designed based on the 5-step framework explained in these guidelines.

- 4.7. **Serious Abuse** – As defined by paragraph 1 of the OECD Due Diligence Guidance, a serious abuse in the procurement of conflict minerals would include:
- Any forms of torture, cruel, inhuman and degrading treatment
 - Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily
 - Child Labour
 - Other gross human rights violations and abuses such as widespread sexual violence
 - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- 4.8. **Responsible Minerals Initiative (RMI)** – Founded in 2008 by members of the Responsible Business Alliance and the Global e-Sustainability Initiative, the Responsible Minerals Initiative has grown into one of the most utilized and respected resources for companies from a range of industries addressing responsible mineral sourcing issues in their supply chains.
- 4.9. **Conflict Minerals Reporting Template (CMRT)** – A free, standardized reporting template developed by RMI that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized.
- 4.10. **Responsible Minerals Assurance Process (RMAP)** – A program developed by RMI to help companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party assessment of smelter/refiner management systems and sourcing practices to validate conformance with RMAP standards, which are designed to meet the requirements of the OECD Due Diligence Guidance, EU Regulation 2017/821, and the Dodd-Frank Act. The assessment employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement.

5. Reference Materials

The Policy is designed in conjunction with other Sonoco policies and is intended to comply with national, regional, and local regulations.

To the extent a provision within any one of Sonoco's policies and procedures conflicts with another policy, procedure, or legal authority, the more restrictive provision applies.

5.1. Related Sonoco Policies

The Policy should be read and understood in conjunction with the following complimentary policies:

- [Code of Conduct Policies](#)
- [Global Whistleblower Policy](#)

5.2. Laws, Regulations, and Guidance

The SEC administers rules concerning ethical procurement of conflict minerals. Rule 13p-1 under the Securities Exchange Act of 1934 and guidance issued by the SEC require publicly traded companies to conduct an annual Reasonable Country of Origin Inquiry (RCOI). The RCOI must be designed to determine whether conflict minerals that are necessary to the functionality or production of products manufactured by a company, or for which a company contracts the manufacture, originated in the DRC or an adjoining country, or are from recycled or scrap sources. To conduct the annual inquiry, Sonoco uses the [OECD Due Diligence Guidance](#), which the SEC has acknowledged as an internationally recognized due diligence framework, in its supply chain due diligence. The Responsible Minerals Initiative (RMI) publishes the [Conflict Minerals Reporting Template \(CMRT\)](#) that Sonoco uses to meet its RCOI obligations. More information can be found on the [SEC website](#) or the [SEC: Final Rule Document](#) for official regulations.

More information on Sonoco's most recent Form SD SEC filing and public position on conflict minerals can be found on the company website on the [Conflict Minerals Policy](#) page.

6. Policy Statements

6.1. Due Diligence Processes Identifying Risks

6.1.1. *Assessing Product Lines*

To identify risks in its supply chain, Sonoco first assesses the likelihood of the presence of conflict minerals in each of its products. Sonoco has determined that most of its metal-based packaging contains tinplate steel. Sonoco may also have other instances where its products contain 3TG minerals.

6.1.2. *Gathering Supplier Data/Supplier Engagement*

Sonoco is typically several stages removed in the supply chain from the smelter or refiner of 3TG minerals that are contained in its products. Sonoco relies principally on its direct suppliers to provide sourcing information. Sonoco therefore annually contacts and follows up on first-tier suppliers of tinplate steel for its metal packaging business to

request information regarding the source and chain of custody of 3TG minerals in its supply chain. To facilitate the collection of complete, accurate, standardized and verifiable information, Sonoco relies primarily on the CMRT made available by the RMI. The CMRT facilitates the transfer of information through the supply chain regarding country of origin, mine location and smelters and refiners used.

6.1.3. *Assessing Supplier Data*

Upon receipt of completed CMRTs from its suppliers, Sonoco assesses the due diligence efforts of each identified smelter or refiner by examining the information provided in the CMRT to determine if that smelter or refiner has been validated under the RMI's Responsible Minerals Assurance Process (RMAP) as "Conformant." The RMAP provides information regarding those smelters or refiners that, following an independent third-party audit, have been found to be compliant with the RMAP's assessment protocols to ensure sourcing of only conflict-free materials. Where information from the RMI is not available, Sonoco conducts its own diligence which includes: contacting its first-tier suppliers for additional information, conducting open-source research and analyzing the likelihood that the 3TG originated from a Covered Country based on the smelter's location.

6.1.4. *Continual Evaluation*

Sonoco continues to evaluate its relationships with its suppliers based upon the respective responses of such suppliers and its own due diligence. In all written contracts and purchase orders with tinsplate steel suppliers, Sonoco includes an obligation of the supplier to cooperate in its efforts to eliminate conflict minerals from the supply chain. Sonoco's Supplier Code of Conduct includes a provision regarding responsible sourcing. Sonoco reserves the right to reassess relationships with any suppliers who do not comply with Sonoco's Conflict Minerals Policy and procedures, and those who violate contractual provisions or policies are subject to enforcement actions by Sonoco.

6.2. *Supplier Noncompliance*

Sonoco expects suppliers to adopt policies and establish their own due diligence programs to ensure conflict-free supply chains and to provide Sonoco only with minerals or products that are conflict-free. If Sonoco becomes aware of a supplier whose supply chain includes minerals that are not conflict free, Sonoco will take appropriate steps to remedy the situation in a timely manner, including reassessment of the supplier relationship.

6.3. *Reporting Process and Timing*

Sonoco utilizes the OECD Diligence Guidance as a framework to ensure proper regulation of conflict minerals. Sonoco files a Form SD with the SEC annually by May 31. Accordingly, the Company should ensure that CMRTs are sent to suppliers and all

relevant information is gathered from suppliers in a timely fashion to facilitate Sonoco's preparation and submission of its Form SD by May 31. Sonoco describes its conflict minerals due diligence processes and training in the annual Corporate Sustainability Report.

6.4. Training

Sonoco offers on-demand Conflict Minerals training via an internal training platform called Sonoco University (Skillsoft). Management takes steps to ensure that Sonoco personnel receive an appropriate level of training for their role. Appropriate roles include business unit leaders, supply management, and compliance personnel.

7.Enforcement

Sonoco's Legal & Compliance Office is accountable for ensuring compliance with the Policy and will review the Policy on an annual basis. Any significant changes to the Policy will be communicated to Sonoco personnel and relevant third parties in a timely manner. Management will ensure that the Sonoco personnel receive appropriate training if deemed necessary.

Employees are encouraged to report any violations of this Policy to their supervisor or to Sonoco's Legal & Compliance Office at complianceoffice@sonoco.com. More information on reporting can be found in the [Global Whistleblower Policy](#). Employees found to be in violation of this Policy may be subject to disciplinary action, including termination of employment and/or additional sanctions as specified under applicable law.

8.Questions

Questions concerning the content of this Policy should be addressed to Sonoco's Legal & Compliance Office at complianceoffice@sonoco.com.