



# Supplier Code of Conduct

# Overview

## Introduction

Sonoco is a global leader in high-value, sustainable packaging that serves some of the world's best-known brands. Our portfolio is comprised of leading products that serve large, attractive end markets for consumer and industrial packaging. Guided by our purpose of *Better Packaging. Better Life.*®, we foster a culture of innovation, collaboration and excellence to provide solutions that better serve all our stakeholders and support a sustainable future. In this document, Sonoco affirms its commitment to comply with both the letter and the spirit of the law in every country where it operates. We also expect our business partners to uphold Sonoco's core values: integrity, respect, service, teamwork and accountability.

Sonoco expects all its suppliers ("Suppliers") to fully comply with this Supplier Code of Conduct (the "Code") as well as all applicable laws and regulations across all areas of their global operations, including all subsidiaries and affiliated companies. Adherence to this Code is a condition of doing business with Sonoco.

## Scope

Sonoco defines a "Supplier" as any third-party with whom Sonoco has an active commercial relationship for the supply of goods or services. This includes, but is not limited to, suppliers of direct and indirect materials, machinery, equipment and other goods and services. The Code applies to all employees, directors, officers, agents, consultants, representatives, distributors and joint venture partners.

## Table of Contents

<b>Business Ethics</b> .....	<u><a href="#">3</a></u>
<b>Human Rights and Labor Practices</b> .....	<u><a href="#">4</a></u>
<b>Health and Safety</b> .....	<u><a href="#">6</a></u>
<b>Sustainability</b> .....	<u><a href="#">7</a></u>
<b>Cybersecurity</b> .....	<u><a href="#">8</a></u>
<b>Compliance</b> .....	<u><a href="#">9</a></u>
<b>Expectations and Enforcement</b> .....	<u><a href="#">10</a></u>
<b>Hotline</b> .....	<u><a href="#">11</a></u>
<b>Conclusion</b> .....	<u><a href="#">11</a></u>

## Introduction

Sonoco is committed to upholding the highest standards of ethical conduct across all aspects of our business operations, as noted in our [Policies on Business Conduct](#).

The Code serves as a fundamental guide to ensure that our partners share and embrace our dedication to ethical principles, fostering a culture of integrity, transparency and accountability. Sonoco believes that strong business ethics are the cornerstone of long-term success and are pivotal in building trustworthy, professional relationships with our suppliers, customers and communities.

## Corruption and Bribery

It is the unalterable policy of Sonoco to conduct Company business legally and ethically, including fully complying with the provisions of the Foreign Corrupt Practices Act (“FCPA”) and all similar laws. Sonoco requires that all Suppliers adhere to the FCPA and all other applicable anticorruption laws in effect wherever they do business.

Sonoco expects all Suppliers to adhere to Sonoco’s [Anti-Bribery and FCPA Policy](#). This Code prohibits any and all improper or illegal payments to foreign officials, political parties or candidates for political office.

## Fair Competition

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

Suppliers must comply with all antitrust laws of the United States and of all international locations in which it does business, in line with Sonoco’s internal commitment to antitrust compliance as detailed in Sonoco’s [Policy for Compliance with Antitrust Laws](#).

## Business Gifts and Courtesies

In any business relationship, 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 Sonoco.

## Conflicts of Interest

Suppliers must avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Sonoco. Suppliers are required to promptly report any actual or potential conflicts of interest through Sonoco’s Business Ethics Hotline, as outlined in the [Hotline section](#). For example, this includes close personal relationships or conflicts between Sonoco’s interests and the personal interests of a supplier’s employees, relatives, friends or business associates.

## Public Communications and Brand Representation

Suppliers must ensure that their employees do not misrepresent, speak on behalf of or disparage Sonoco in any public or online forum. This includes, but is not limited to, social media platforms, blogs, online forums and other digital communication channels.

# Human Rights and Labor Practices

## Introduction

Respect for human rights is a basic tenant of Sonoco's beliefs and is consistent with our values and our goal to be a more economically, socially and environmentally sustainable Company. Sonoco's 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 positively or negatively impact our employees, communities and partners.

Sonoco's Standards of Business Conduct provide a worldwide framework for responsible operations and are consistent with the spirit and intent of the International Labor Organization (ILO) 1998 Fundamental Principles and Rights at Work. Sonoco actively supports the United Nations Global Compact and adheres to the obligations set by the ILO Declaration for Member States to promote and realize the following 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

Suppliers are also expected to maintain respectful workplaces free from harassment and to provide accessible grievance mechanisms that allow workers to raise concerns without fear of retaliation.

## Fair and Safe Work

Sonoco expects Suppliers to compensate employees competitively relative to the industry and local labor market and in accordance with terms of applicable collective bargaining agreements. Suppliers must work to ensure full compliance with applicable wages, work hours, overtime and benefits laws. Suppliers must 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 must 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.

## Rights of Children

Suppliers must support the elimination of exploitative child labor practices and must not recruit child labor. All Suppliers' employees are required to be above the legal employment age in the country of their employment. Suppliers must also support laws duly enacted to prevent and punish the crime of sexual exploitation of children and must cooperate with law enforcement authorities in these matters.

## Forced Labor

Suppliers must recruit their employees and provide working conditions, including payment of wages and benefits, that comply with applicable laws and regulations. Employment must be freely chosen; under no circumstances should workers be subjected to force, coercion or intimidation. Suppliers must not permit the use of forced or compulsory labor, including indentured labor, modern forms of slavery or human trafficking in their own facilities or in their supply chain.

# Human Rights and Labor Practices

## Non-Discrimination

Sonoco is an Equal Opportunity Employer committed to providing its employees with a safe, non-discriminatory work environment that promotes open and honest communication and embraces dignity, respect and diversity in all aspects of its business operations.

Suppliers must not tolerate disrespectful, inappropriate or discriminatory behavior, unfair treatments or retaliation of any kind. Suppliers must ensure harassment is not tolerated in the workplace or in any work-related circumstances outside the workplace.

Suppliers are expected to foster an environment wherein all employees, job candidates, stakeholders and community members are treated with fairness, dignity and respect. Suppliers must ensure equal opportunity regardless of race, gender, ethnicity, age, physical ability, religion, sexual orientation or any other personal characteristic or identity.

## Hours of Labor

Suppliers must 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. Employees should be permitted reasonable days off and leave privileges and must have proper compensation as required by applicable law.

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

## Indigenous People

Sonoco expects Suppliers to respect the cultures, customs and values of the people in communities where they operate and strive to consider their needs, concerns and aspirations. This includes protecting indigenous people's traditions, water sources and land.

## Introduction

The Safety and Health of Sonoco Employees shall be of the greatest interest to all levels of leadership, ranking in importance above production, quality, cost and service. Every employee has responsibility for their area of influence, from the plant floor to the boardroom. Sonoco believes that the employees performing the work are the most knowledgeable. We foster an environment in which everyone is engaged in safety improvement efforts, safety teams, learning events and exposure reduction. Sonoco maintains a focus on exposure reduction and continuous improvement by deploying the best methods, tools, technology and professional resources available.

## Safe Work Environment

Sonoco expects Suppliers to promote a safe and respectful work environment for all employees. This includes taking proactive measures to identify and mitigate workplace hazards, ensuring employees are properly trained and equipped to perform their duties safely and fostering a culture where safety is prioritized at every level. Suppliers must maintain mature health and safety practices to support the physical and mental well-being of their workforce.

## Safety Regulations

Suppliers must comply with all applicable local, state, federal and international health and safety laws and regulations. This includes maintaining accurate records, conducting regular safety audits and promptly addressing any identified risks or incidents.

## Safety Programs

Suppliers must maintain a safe work environment which actively engages all employees in identifying, preventing and correcting workplace safety issues to reduce incidents and eliminate Life Changing Events. Sonoco expects Suppliers to comply with our safety mission, including identifying and eliminating hazardous conditions, maintaining an effective safety and injury prevention program, and allocating the necessary resources to assure a safe and healthy work environment for employees.

## Sonoco Facility Expectations

Whenever Suppliers' employees or representatives are present at a Sonoco facility, operating a Sonoco vehicle or working in proximity to Sonoco personnel, Suppliers must strictly enforce the following prohibitions:

- Being under the influence of alcohol, unauthorized drugs or controlled substances.
- Possessing, using, distributing, manufacturing or selling alcoholic beverages or illegal substances.
- Possessing or bringing weapons of any kind.

## Introduction

Sonoco's focus on sustainability is directly linked to and supports our mission statement. Sonoco believes that providing a good place to work and being a good steward of our environmental resources will make us a stronger, more competitive company, enhance our reputation and enable us to better support our stakeholders.

## Environmental Impact

Suppliers accept their ethical responsibility to protect the environments they impact and must conduct all business in accordance with all applicable environmental laws and regulations in the jurisdictions in which they operate.

## Resources

Sonoco expects its Suppliers to develop sourcing methods, goals and monitoring procedures and to make real efforts to control and reduce energy use. Suppliers must track key sustainability metrics to be part of their supplier rating including greenhouse gases (GHGs), water and energy consumption, solid waste and hazardous air pollutant (HAP) emissions. Sonoco also requests that Suppliers establish the carbon footprint of the product delivered according to greenhouse gas (GHG) protocols.

## Recyclability

Sonoco expects Suppliers to make reasonable efforts to clearly identify their product life cycle analysis (LCA) and improve the recyclability of their products where possible. Suppliers are expected to contribute to recyclable product collection, sorting and solutions in efforts to minimize landfill waste.

## ESG Frameworks

Sonoco encourages Suppliers to utilize internationally recognized ESG frameworks (e.g., Ecovadis, Carbon Disclosure Project (CDP), Science Based Target initiatives (SBTi), Task Force on Climate-Related Financial Disclosures (TCFD), Supplier Ethical Data Exchange (SEDEX) or others) and participate in respective audits or questionnaires' requests.

# Cybersecurity

## Introduction

In today's digital world, safeguarding information and protecting against cyber threats are paramount to the integrity and success of any business. Sonoco recognizes that robust cybersecurity measures are essential for maintaining the trust of our stakeholders and ensuring the continuity of our operations.

## Security Program

Suppliers must maintain a Network and Information System Security Program ("Security Program") that:

- Is designed to (a) ensure the security and confidentiality of Suppliers' network and information systems; (b) protect against any anticipated threats or hazards to the security or integrity of its network and information systems; and (c) protect against unauthorized access to or use of network and information systems.
- Sets forth Suppliers' policies for responding to any event compromising the availability, authenticity, integrity or confidentiality of stored, transmitted or processed data or of the services offered by, or accessible via, Suppliers' network and information systems ("Incident").

## Cybersecurity Risk Management

Suppliers must implement and maintain cybersecurity risk management measures that:

- Ensure a level of security of Supplier's network and information systems appropriate to the risks posed considering the state-of-the-art.
- Are based on an "all-hazards" approach to protect Supplier's network and information systems and the physical environment of those systems from incidents.
- Include at least the following: (a) policies on risk analysis and information system security, including measures to assess their effectiveness; (b) measures to identify any risks of incidents, including incident handling procedures; (c) business continuity, disaster recovery and crisis management; (d) supply chain security, including security-related aspects concerning the relationships between Supplier and its direct suppliers or service providers; (e) security measures to control access to facilities, systems and data whether in transit or at rest; and (f) basic cybersecurity training for staff on a regular basis.

## Regulatory Cooperation and Inspections

Notwithstanding the above, Suppliers must, as necessary following a binding request or order that Sonoco has received from a legitimate authority:

- Provide Sonoco with all the necessary documentation to respond to the competent authority's request or order.
- Allow for a competent authority to conduct as appropriate on-site and off-site inspections, including random checks and security audits conducted by trained professionals appointed by the competent authority, at the Suppliers' costs and expense except where the competent authority decides otherwise.

## Remediation and Continuous Improvement

Suppliers must use commercially reasonable efforts to implement any requests or recommendations from Sonoco or a competent authority following any such inspection by a competent authority to remedy any deficiencies identified and/or revise its Security Program.

## Introduction

Sonoco is committed to conducting our business with the highest standards of integrity and in compliance with all applicable laws and regulations. Suppliers' adherence to these same principles is crucial to maintaining our shared reputation and ensuring the smooth operation of our global supply chain.

## Requirement for Written Confirmation

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

## Confidentiality

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

## Intellectual Property

Suppliers must respect the intellectual property rights of Sonoco and others and comply with their legal and contractual obligations to Sonoco, with respect to the protection of all intellectual property provided to them by or on behalf of Sonoco.

## International Trade

Suppliers must confirm that they nor any of their shareholders, beneficial owners, directors or executive management are listed as Designated Persons or Specially Designated Nationals by any of the EU, UK or U.S. and are not located or resident in jurisdictions subject to comprehensive sanctions.

Suppliers must assist Sonoco by complying with all trade laws applicable to Sonoco in the performance of their obligations. Those trade laws include EU and U.S. trade sanctions laws, export controls laws, import laws and laws regarding supply chain security and sustainability, including laws related to the origin of goods or services that Suppliers provide to Sonoco and laws relating to human rights ("International Trade Laws").

Suppliers must confirm that they must not do anything or otherwise to cause Sonoco to be exposed to any potential sanctions or penalties for non-compliance with International Trade Laws.

## Tax and Financial Controls

Sonoco expects that Suppliers act with integrity in all tax matters and engage only in reasonable tax planning that is aligned with commercial and economic activity and does not lead to abusive results.

Suppliers must maintain strong financial controls and keep complete and accurate records of all business operations and transactions in accordance with applicable retention policies and laws.

# Compliance

## Conflict Minerals

Suppliers that use tantalum, tungsten, tin, gold, or any other “Conflict Minerals” (as may be defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the implementing regulations thereof, and any other applicable law, “Conflict Minerals Rule”) in the manufacture or production of any goods or services must:

- Disclose to Sonoco the presence, identity, origin, and use of such Conflict Minerals and the facility and location at which such Conflict Minerals were processed.
- Provide Sonoco with any additional information requested by Sonoco with respect to such Conflict Minerals.
- Comply with Sonoco’s current [Conflict Minerals Policy](#).
- Represent and warrant that such Conflict Minerals either did not originate in The Democratic Republic of the Congo or any “adjoining country”, or originated from “recycled” or “scrap” sources (as such terms may be defined in a Conflict Minerals Rule).
- Represent and warrant that such Conflict Minerals were sourced from smelters that have been certified as “conflict free” by the Conflict Free Sourcing Initiative.

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 Suppliers relationship. Sonoco expects Suppliers to take similar measures with their Suppliers.

## Expectations and Enforcement

### Accountability

Sonoco reserves the right to conduct audits and require proof of compliance with this Code. As part of Sonoco’s Third-Party Risk Management (TPRM) program, Sonoco reserves the right to request additional information and questions to ensure compliance with such program. Sonoco reserves the right to terminate a Supplier relationship with immediate effect in respect of any non-compliance by the Suppliers with the provisions in this Code.

### Violations

Any violations of this Code must be reported to Sonoco. Sonoco partners with a third-party provider to offer a secure and confidential hotline for reporting by both internal and external parties. Additional details are provided in the following section.

Sonoco requires that Suppliers and any of their contractors accept the Supplier Code of Conduct as detailed below prior to conducting business with Sonoco.

### Compliance Inquiries

If requested, Suppliers must promptly respond to any reasonable inquiries, questionnaires or document requests from Sonoco (and/or its agents) regarding the content of this Code, subject to confidentiality obligations.

### Right to Modify the Code

Sonoco reserves the right to add to or modify this Code from time to time. Suppliers are expected to comply with the latest version of this Code that is posted on Sonoco’s website or that is otherwise provided directly to them.

## Hotline

Sonoco partners with a third-party to administer a Business Ethics Reporting Hotline. Any violations or suspected violations to Sonoco's Suppliers Standards should be reported via the Hotline ([sonoco.ethicspoint.com](http://sonoco.ethicspoint.com)) or directly to Sonoco's Legal & Compliance Office ([complianceoffice@sonoco.com](mailto:complianceoffice@sonoco.com)). The Hotline is available 24/7.

Reports can be submitted anonymously, in most preferred languages and through the reporter's preferred method (web or phone). All reports will be reviewed and investigated in accordance with Sonoco's Compliance program. To the extent applicable and possible, Supplier representatives who report concerns in good faith will be afforded the same protections from retaliation as internal whistleblowers.

## Conclusion

Sonoco's Supplier Code of Conduct details our standards and expectations for Suppliers. Sonoco is committed to supporting Suppliers in meeting our standards and expectations through collaboration, education and transparency. By adhering to this Code, Suppliers not only contribute to a responsible and sustainable supply chain but also align themselves with Sonoco's core values of integrity, respect, service, teamwork and accountability.