



# Anti-bribery and Foreign Corrupt Practices Act Policy

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## Scope and Purpose

This policy sets forth the Company's expectation of full compliance with the Foreign Corrupt Practices Act ("FCPA") and all other applicable anti-corruption laws in effect wherever the Company does business. This policy applies to all operations of the Company 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 "Company Representatives") of the Company.

It is the unalterable policy of the Company 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 Company Representative has the authority to act contrary to the provisions of this policy.

While the specific requirements of laws enacted in countries other than the United States (such as Canada's Corruption of Foreign Public Officials Act, and the U.K.'s Bribery Act) are not described in this policy statement, all Company Representatives operating in foreign countries must understand the provisions of all local anti-corruption laws and fully comply with them in addition to complying with the FCPA.

This policy is not a detailed explanation or recitation of all the specific provisions of the applicable laws related to bribery and corruption, nor is it an exhaustive list of activities that could potentially affect the reputation and goodwill of the Company. It is intended, rather, to supplement and clarify the Company's rigorous rejection of illegal and unethical payments as already set forth in "Setting the Standard: Policies on Business Conduct". This policy should be read in conjunction with the Company's Policies on Business Conduct, the receipt, review, and acceptance of which are required to be acknowledged by all salaried

employees (including directors) at hire and thereafter on a bi-annual basis. With the initial and bi-annual acknowledgments, each employee agrees that he or she must conduct himself or herself in accordance with the policies described in the Company's Policies on Business Conduct, and must disclose any current or future conflicts of interest or violations of Sonoco policies that come to the employee's attention. Any questions or concerns regarding proper business conduct, or reports of policy violations, should be directed to your supervisor, Company counsel, or the Business Conduct Hotline. Retaliatory action against any employee for reporting such concerns will not be tolerated.

Doing business ethically is a core value for the Company, and the Company is fully committed to fair and honest business practices in all of the locations in which it operates.

## FCPA Overview

The FCPA makes it unlawful to pay, offer, promise, or authorize the payment of "anything of value" to any "foreign official" (including an officer or employee of a government or any related department or government-owned enterprise, and spouses and immediate family members of such officials) to help obtain or keep business or secure some other improper business advantage. This prohibition applies whether the offer or payment is made directly or through another person.

The statute prohibits not only payments to public officials, but also offers or promises, even if never fulfilled. Such prohibited payments or offers can be direct or indirect through a third party. Payments are not limited to money, but can include anything of value, including non-monetary gifts, trips, excessive entertainment and other forms of non-cash favors, as well as gifts to foreign charities.

There are some very limited exceptions to these restrictions, and the exceptions are narrowly interpreted. For instance, the FCPA grants a narrow exception for “facilitating payments” made to secure certain routine government actions (a U.S. example would be paying a small fee to have a passport expedited). Nevertheless, the Company strongly discourages facilitating payments, and therefore, all facilitation payments greater than the equivalent of US\$100 individually or in aggregate over a twelve month period to one government official or government employee must be approved in advance by the Company’s legal counsel. Such pre-approval requests must list the details for the proposed payment and include the amount, the recipient, the name of the recipient’s employer/government entity, and the justification for the proposed payment. Note that all facilitating payments, even those under the equivalent of US\$100, must be reported immediately to the Company’s legal counsel, providing the same information noted above for a pre-approval request.

Company Representatives working with agents and other third parties should pay particular attention to unusual or suspicious circumstances that may indicate possible legal or ethical violations, or that may increase the possibility of unethical activity. Agents or other third parties should be approved by a general manager or vice-president of the applicable region or business unit.

In addition to prohibiting improper payments to foreign officials, the FCPA requires the Company to keep accurate books and records of the transactions in which it engages, and to maintain a system of internal controls that, among other things, can prevent “slush funds” and “off-the-books” accounts that might be used to facilitate or conceal questionable foreign payments. Thus, the FCPA prohibits the mischaracterization or omission of any transaction on our books or any failure to maintain proper accounting controls that result in a mischaracterization or omission. Accordingly,

covering up a transaction that violates the FCPA by mischaracterizing it on the books is itself a separate violation of the FCPA. Importantly, the FCPA accounting requirements apply to all business activities, not just those involving foreign officials.

## Penalties and Enforcement

Penalties for violating the FCPA can be severe, and they can apply to both the Company and to the individuals involved. Corporations are subject to criminal fines of up to US\$2,000,000 and civil fines up to US\$10,000 per violation. An increasingly large number of companies have settled FCPA charges for amounts in the hundreds of millions of dollars. The costs of defense and compliance can also reach substantial levels. Individuals are subject to criminal fines up to US\$100,000, imprisonment for up to five years, or both. Individuals are also subject to civil fines up to US\$10,000. These sanctions are in addition to potential reputational damage and investigation and defense costs, which may arise even without a formal government prosecution. Violations of the FCPA are not covered by Directors and Officers Insurance and individuals cannot be indemnified by their employer for such violations.

The Company takes its obligation to comply with the FCPA and similar laws very seriously. Accordingly, Company Representatives who fail to follow this Policy and its intent, whether expressly stated in this Policy or otherwise, may be subject to disciplinary action, including dismissal where warranted.

## Audit of Activities

The Company’s Internal Audit Department will be responsible for conducting periodic risk assessments, surveys and direct audit procedures to determine compliance with this policy.

## Other Compliance Procedures

All acquisition targets will be subject to reasonable due diligence procedures to allow the Company to make an assessment as to the targets' compliance with the FCPA and similar laws.

The Company will provide periodic FCPA training and education opportunities to employees and require that certain levels of management participate (including, but not limited to, the management executive committee and all other officers of the Company).

## Questions, Concerns and Reporting

Any questions or concerns about the policy or how to comply with it should be directed to the Company's legal counsel. Any Company Representative who believes that the Company or a Company Representative is acting in violation of the FCPA should report the concern and potential violation to his or her supervisor, the Company's legal counsel, or through the Business Conduct Hotline (reports via the Business Conduct Hotline may be reported anonymously and in confidence).

## Contact Information

### Company Counsel:

John M. Florence  
1 North Second Street  
Hartsville, SC 29550  
john.florence@sonoco.com

### Business Conduct Hotline (Can be reported anonymously)

1. U.S., Canada, Puerto Rico and U.S. Virgin Islands: call 1 800 241 5689
2. All other locations: 1 770 810 1147, a translator is provided.
3. Visit: <https://sonocohotline.tnwreports.com> (Translations are available via the web)

**This reporting service is available 24 hours a day, seven days a week.**