



BEMIS SUPPLIER CODE OF CONDUCT

At Bemis, our actions and achievements are guided by our core values, which we aim to exemplify every day. As a global leader in the food and medical packaging industry for over a century, we believe our values are the source of our long-term success. Innovation, Accountability, Respect, and Ethics are at the heart of all that we do, all that we stand for, and all that the world has come to expect from us.

Because our values are fundamental to the way we operate, we aim to cultivate relationships with Suppliers who share in our passion for excellence and ethics. In this regard, we ask that our vendors and their employees, agents and subcontractors (which we collectively refer to as “Suppliers”) adhere to the Bemis Supplier Code of Conduct. This Code of Conduct details the responsibilities and expectations that we hold for our Suppliers, as well as for ourselves. It reflects what we believe is the basis for the ethical stewardship of our environment, our business relationships, and our customers’ trust.

Because we take this Supplier Code of Conduct seriously, we also hold ourselves to its standards. If, over the course of your business with Bemis, you observe a Bemis employee or Supplier engaged in known or suspected unethical or illegal behavior, we encourage you to contact us.

We at Bemis thank you for your cooperation, and recognize the vital role that our Suppliers play in our continued success. We look forward to growing with you in the future.

Laws, Regulations and Contractual Obligations

At a minimum, Suppliers must perform all duties, services and contractual obligation in compliance with all laws and regulations applicable to their business. Further, Suppliers must comply with the terms, conditions and other provisions specified in their contract with Bemis, or in the Bemis purchase order.

Labor Practices

At Bemis, we believe everyone should be treated with dignity and respect. All of our colleagues are entitled to work in a supportive and mutually beneficial environment. We request that you do the same for your employees. As part of our commitment to Respect, we ask that Suppliers adhere to all appropriate labor laws and regulations, as well as the conventions of the International Labor Organization (ILO). These requirements include:

- » **Freely chosen employment**

Bemis is committed to respecting and protecting the human rights of individuals and communities. All Supplier employment must be freely chosen. Forced or bonded labor, human trafficking, forced prison labor, or involuntary labor through threat, force, coercion, confiscation of government identification, or fraudulent claims are all strictly prohibited.

- » **No child labor**

Suppliers must not use child labor. Suppliers must only use employees that are at or above the minimum legal age for employment in each country where they operate. Suppliers will avoid employment that may be mentally, physically, socially, or morally



dangerous to children, or that interferes with their schooling. Work which by its nature or as a result of the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons may not be entrusted to anyone under the age of 18.

» **Non-Discrimination**

Bemis values diversity and equal opportunity. We require that Suppliers treat their existing and prospective employees fairly, and not discriminate on the basis of race,

color, descent, religion or belief, political opinion, national or ethnic origin, nationality, sex, pregnancy, age, disability, health, physical or genetic characteristic, sexual orientation, gender identity, marital status, military service, membership of a union or any other status protected by law.

» **Respect and Dignity**

We believe that Respect is the cornerstone of any effective relationship. Suppliers must treat all employees with respect, and should actively deter and prohibit any forms of corporal punishment, threats of violence, verbal, physical, or visual abuse, or other forms of mental, sexual, or physical coercion or harassment.

» **Labor Laws**

Providing a decent wage and appropriate work hours is vital to respecting employees. Suppliers must comply with all applicable labor laws (including any applicable collective bargaining agreements), particularly those related to wage, vacation and working hour regulations, as well as those in relation to the occupation of foreign workers, the use of such works or providing workers to third parties.

Safety Practices

As part of our commitment to Respect and Accountability, we ask that Suppliers take precautions in regards to the safety of their employees. At Bemis, we take responsibility for keeping ourselves and each other safe, secure and healthy in the workplace. We protect our visitors and communities from harm. We ask that you do the same.

» **Safety Standards**

Suppliers must make efforts to institute best practices in regards to safe working environments for its employees. These environments will fully comply with all safety and health laws, regulations, and practices, including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing. Appropriate steps must be taken to minimize the causes of hazards in the workplace.

» **Training**

Suppliers should provide adequate training for employees on applicable local workspace safety practices. Such practices should be designed to help prevent accidents and injuries.



Environmental Practices

At Bemis, we take responsibility for minimizing the environmental impact of our operations. We do this through continuous improvement in product sustainability and the careful management of our manufacturing processes. As part of our commitment to Innovation and Accountability, we ask that our Suppliers share in this undertaking.

- » **Environmental Laws**
Suppliers must comply with all applicable environmental laws and regulations regarding hazardous materials, waste and wastewater discharges, and air emissions.
- » **System Improvement**
Bemis actively pursues ways to minimize its environmental footprint, and we expect Suppliers to do the same. Suppliers are encouraged to identify and adopt environmental best practices into their business processes, particularly those that reduce waste, air emissions, and energy costs. Any risk that could negatively impact the natural environment, as well as the health and rights of individuals and communities, should be stemmed or extensively mitigated.

Fair Business Practices

At Bemis, we compete energetically and honestly for business. We succeed on the strength of transformative ideas and technology that bring value to customers, and never through inappropriate conduct in the marketplace. We ask the same of you. As part of our commitment to Ethics, Bemis requires that its Suppliers maintain ethical business standards of operation.

- » **Bribes and Corruption**
Bemis is committed to conducting its business free from extortion, bribery, and all unlawful, unethical or fraudulent activity. Suppliers must follow all applicable anti-corruption laws and regulations. Any forms of bribery, kickbacks, corruption, extortion, or embezzlement are prohibited. Suppliers are also expected to institute adequate procedures to prevent bribery and corruption.
- » **Gifts**
While there is nothing wrong with relationship-building, Suppliers should be wary of attempting to give gifts to Bemis employees. Even well-intentioned gifts may constitute a bribe in certain circumstances, or create a conflict of interests. Suppliers should not offer anything of value in order to obtain a benefit or advantage, and must not offer anything that might appear to influence, compromise the judgement of, or obligate a Bemis employee.
- » **Conflicts of Interest**
At Bemis, we put Company goals and customer interests before personal gain, because doing so helps us make unbiased, smart decisions that benefit all. We expect the same of our Suppliers. Suppliers should avoid conflicts of interest, or even the appearance of a conflict of interest. A conflict of interest occurs when a person has a personal interest or is involved in an activity that could interfere with such person's ability to perform tasks in an objective, impartial and effective manner. All actual and apparent conflicts of



interest between Bemis and its Suppliers shall be reported to Bemis prior to entering into any business transaction.

» **Insider Trading**

Bemis's business partners must ensure that non-public information obtained over the course of their relationship with Bemis is not used for the personal benefit of Supplier's business partners, their employees or others.

» **Export/Import Controls**

Suppliers will comply with all applicable laws and regulations governing the import, export and re-export requirements and restrictions of domestic and foreign origin parts, components and related technical data.

» **Record Retention**

Suppliers must honestly and accurately keep records of all pertinent business information and comply with all applicable laws regarding their completion and accuracy. Accounting records must, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited.

» **Fair Competition**

We believe in open and fair competition. We only seek competitive advantage through fair and lawful means. Our Suppliers must not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern their jurisdiction.

» **Confidentiality/Intellectual Property**

Suppliers will respect the intellectual property and confidentiality rights of others. In particular, Suppliers will protect and responsibly use the physical and intellectual assets of Bemis, when given permission to use said assets. This includes any necessary confidential information shared between the two parties.

Conflict Minerals

We expect our Suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, tungsten and gold). If so, we expect these Suppliers to implement supply chain due diligence processes to identify the sources of these minerals, and to support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

Right to Monitor, Audit, and Terminate

Because we value these principals, Bemis reserves the right to verify our Suppliers' compliance with this Supplier Code of Conduct through audits or other monitoring activity. In the event that Bemis becomes aware of any actions or conditions that violate our Supplier Code of Conduct, we will request that appropriate corrective actions be taken. In the event that appropriate corrective actions are not taken, Bemis reserves the right to terminate any business relationship between it and the Supplier for breach without judicial intervention and without any indemnity being due.



Reporting Concerns

We encourage active reporting of any perceived violations. If you think something might be wrong, it probably is.

Suppliers are responsible for promptly informing their Bemis contact when any situation develops that causes the Supplier to operate in violation of the law or this Code of Conduct. And because we hold ourselves to these principles as well, we encourage you to report any perceived violations involving Bemis employees. Suppliers who believe that a Bemis employee, or anyone acting on behalf of Bemis, has engaged in illegal or improper conduct, should report the matter to Bemis without fear of any negative impact on the business relationship.

When legally permissible, Suppliers and any individual employee of a Supplier can confidentially report their concerns via phone, web, or email 24 hours a day, seven days a week.

To Connect by Phone:

Argentina.....	00 800 1777 9999
Australia	0011 800 1777 9999
Belgium	00 800 1777 9999
Brazil	0021 800 1777 9999
Chile.....	1230 020 3559
China (all carriers)	00 400 120 3062
Czech (collect call/reverse charge call).....	+1 720 514 4400
Denmark.....	00 800 1777 9999
Finland	990 800 1777 9999
France (includes Andorra, Corsica, and Monaco).....	00 800 1777 9999
Germany.....	00 800 1777 9999
Hong Kong	001 800 1777 9999
Ireland.....	00 800 1777 9999
Italy.....	00 800 1777 9999
Japan	001 800 1777 9999
Malaysia	00 800 1777 9999
Mexico	001 866 376 0139
New Zealand.....	00 800 1777 9999
Norway	00 800 1777 9999
Poland	00 800 111 3819
Singapore	001 800 1777 9999
Spain (includes Canary Islands).....	00 800 1777 9999
Sweden	00 800 1777 9999
Switzerland (includes Lichtenstein)	00 800 1777 9999
United Kingdom (includes England, Scotland, Northern Ireland, and Wales).....	00 800 1777 9999
United States (includes US Virgin Islands, Puerto Rico, and Guam).....	800 461 9330
Uruguay (collect call/reverse charge call)	+1 720 514 4400

If your country is not listed above, please check the website (complianceconnection.bemis.com) to see if a toll-free dialing option is available. Otherwise, you may use +1 720 514 4400 for a collect call/reverse charge call.



To Connect Through the Web:

www.complianceconnection.bemis.com

Other Ways to Connect:

You may also contact the Compliance & Business Integrity Team in any of the following ways:

- **E-mail:** corporate.compliance@bemis.com
- **Phone:** 920-527-5668
- **Mail:** Compliance & Business Integrity Team

Bemis Company, Inc.
One Neenah Center
PO Box 669
Neenah, WI 54957

Bemis will maintain confidentiality to the extent possible (subject to applicable laws). Bemis will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation to this Supplier Code of Conduct.

Bemis will not store information or personal data for longer than necessary to investigate a report and subsequently take the required action.

Under the data privacy laws in certain jurisdictions, individuals are at all times entitled to access their own personal data and correct incomplete or inaccurate data or request its removal. Requests in this regard can be made to the Company directly at corporate.compliance@bemis.com. The right to access, correction and removal of personal data will only be postponed in exceptional circumstances (e.g. to prevent the destruction of evidence) and always in compliance with law.

Note to individuals covered by EU data protection laws: In the frame work of reporting or investigating concerns under this Supplier Code of Conduct, personal data may be made available to service providers or other Bemis entities or personnel based in other countries, which may not be part of the EEA. The Company will take appropriate measures to ensure that such transfers comply with the EU data protection requirements.

INNOVATION, ACCOUNTABILITY, RESPECT, AND ETHICS