

Supplier Code of Conduct

Introduction to JBM Packaging

We are a 2nd generation, family-owned business that focuses on our people, our culture, the quality of our products, the innovation we bring to our customers and the importance of being a good citizen in our community. From inside our corporate offices and throughout our state-of-the-art manufacturing facility, we live by a set of core values that guide our every decision and make us who we are.

Our core values are more than just words on paper. We live and breathe them in our day-to-day operations. They guide how we work and how we serve each other and our customers. Our culture is built on these shared values, and we look for these qualities during our recruiting process because each team member contributes to creating an environment that is collaborative and supportive to our growth and our customer's success. Our core values are shown below.



Our Purpose is to create "Better Solutions, Better Lives, and a Better World." Our purpose is grounded in the belief that better solutions lead to better lives which, in turn, creates a better world. We live by these principles every day. From continuous improvements in our processes, products, and services (Better Solutions) to improving the health and wellness of our employees and helping our clients thrive (Better Lives) to finding ways to give back and improve our communities and the planet (Better World), our goal is to leave a lasting impression for generations to come.

Finally, our Vision is to "Be the Role Model of a Sustainable, Purpose Driven Company".

Purpose of the Supplier Code of Conduct

A Supplier Code of Conduct is the official document of rules, principles, expectations and values that are fundamental for an organization to operate in a social, ethical and environmental manner. It provides guidance and could be described as a guide book of JBM Packaging's requirements on stakeholders.



Naturally, we can assume all our stakeholders follow the law. With this code of conduct we don't only define legal ramifications and set rules, like anti-bribery practices, but also explain what ethical values JBM Packaging stands behind, such as inclusiveness, gender equality or other cultural cornerstones.

This Supplier Code of Conduct clarifies the standards we expect from our suppliers and their supply chains. These principles should be viewed as 'best practice' expectations. They are not intended to conflict with or modify the terms of any supplier contract with JBM Packaging. If a JBM Packaging contract, and/or applicable law or regulation, addresses any area covered by this Supplier Code of Conduct, suppliers must comply with the contract and/or legal or regulatory requirement.



What we expect from our suppliers

Compliance with Laws, Regulations and Published Standards

JBM Packaging suppliers must comply with all applicable laws, codes or regulations of the countries, states and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices. In addition, JBM Packaging suppliers must require their suppliers (including temporary labor agencies) to do the same.

Ethical Business Practices

Suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. Suppliers are expected to conform to these requirements:

Fair Trade Practices

Suppliers shall not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of antitrust laws.

Bribery, Kickbacks and Fraud

No funds or assets of the supplier shall be paid, loaned or otherwise disbursed as bribes, "kickbacks", or other payments designed to influence or compromise the conduct of JBM Packaging, its employees or representatives.

Intellectual Property Rights

Suppliers shall respect the intellectual property rights of others, including JBM Packaging its affiliates and business partners. Suppliers must take appropriate steps to safeguard and maintain confidential and proprietary information of JBM Packaging and shall use such information only for the purposes specified for use by JBM Packaging. Suppliers shall observe and respect all JBM Packaging patents, trademarks and copyrights and comply with all requirements as to their use as established by JBM Packaging. Suppliers shall not transmit confidential or proprietary information of JBM Packaging via the internet unless such information is encrypted accordance with minimum standards established by JBM Packaging.

Environmental Practices

Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to release of any substance into the environment. Suppliers will have systems in place to prevent or mitigate accidental spills and releases into the environment.

JBM Packaging suppliers shall comply with all environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, among other things, the following items:

- Obtaining and maintaining environmental permits and timely filing of required reports
- Proper handling and disposition of hazardous materials
- Monitoring, controlling and treating discharges generated from operations



Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilization. Suppliers will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

Occupational Health and Safety Practices

JBM Packaging suppliers shall provide their employees with a safe and healthy working environment in order to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of the supplier. Suppliers shall, among other things, provide:

- Occupational health and safety training
- A system for injury and illness reporting
- Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.
- Medical treatment and/or compensation to injured/ill workers arising as a result of working for supplier.
- Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.
- Machine safeguarding and other protective measures to prevent injuries/illnesses to workers
- Workers are to be provided clean and safe facilities including clean toilet facilities, access to potable water and sanitary food preparation and storage facilities.
- Worker dormitories provided by the Suppliers are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

Labor Practices

JBM Packaging expects its suppliers to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. In addition, suppliers must comply with the following standards:

Freely Chosen Employment

Suppliers shall not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.

No Child Labor

Suppliers shall comply with local minimum working age laws and requirements and not employ child labor.

Minimum Wages

Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.



Working Hours

Suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws.

No Harsh, Inhumane Treatment or Abuse

Suppliers shall treat each employee with dignity and respect. In no event shall Supplier's workers be subject to threats of violence, physical punishment, confinement or other form of physical, sexual, psychological or verbal harassment or abuse.

No Discrimination

Suppliers shall not discriminate in its employment practices on the basis of race, color, religion, sex, age, physical disability, national origin, creed or any other basis prohibited by law.

Freedom of Association

Suppliers shall recognize and respect the rights of its workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining in accordance with local labor laws and established practices.



Communication of Sustainability Criteria in Supply Chain

Suppliers will communicate the principles set forth in this Supplier Code of Conduct to their supply chain.

Continuous Improvement

Suppliers are expected to continuously improve their sustainability performance by implementing appropriate measures.

Training and Competency

Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.

Export Sanctions/Terrorism Activities

JBM Packaging suppliers must abide by all economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political or to particular foreign individuals.

Suppliers must not directly or indirectly engage in or support any terrorist activity.

Solicitations by Suppliers

All suppliers shall comply with all guidelines issued by JBM Packaging relating to access to JBM Packaging facilities, offices and departments, and employees. No Supplier shall use JBM Packaging's computer system, including its electronic mail system and internet site, for purpose of sending unsolicited electronic mail messages to the JBM Packaging community.

Suppliers must receive prior written authorization from JBM Packaging Management to hold trade shows, demonstrate products, utilize JBM Packaging's resources, or make unsolicited calls on JBM Packaging departments.

Monitoring and Compliance

Suppliers shall conduct audits and inspections to insure their compliance with this Supplier Code of Conduct and applicable legal requirements. If a supplier identifies areas of noncompliance, the supplier agrees to notify the relevant JBM Packaging Purchasing Manager as to its plans to remedy any such noncompliance.

JBM Packaging or its representatives may engage in monitoring activities to confirm Supplier's compliance to this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess supplier's performance.

Suppliers are expected to develop adequate documentation to demonstrate that they share the principles and values expressed in this Supplier Code of Conduct. This documentation may be reviewed by JBM Packaging upon mutual agreement.



Any JBM Packaging supplier or JBM Packaging employee that becomes aware of violations of this policy is obligated to notify JBM Packaging's (Supply Chain) management. Based on the assessment of information made available to JBM Packaging, JBM Packaging reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier or terminate any relationship with any current supplier found to be in violation of the supplier Code of Conduct without liability to JBM Packaging.

Risk Management

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements.

Commitment and Accountability

Suppliers are encouraged to fulfill the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources.

Applications and Exclusions

This Supplier Code of Conduct is a general statement of JBM Packaging's expectations with respect to suppliers. This Policy should not be read in lieu of but in addition to any supplier obligations as set forth in any (i) request for proposal or other solicitation, or (ii) agreements by and between JBM Packaging and the Supplier. In the event of a conflict between this Policy and any JBM Packaging solicitation document or applicable agreement, the terms of the solicitation document or applicable agreement shall control.

No exclusions are applicable to this policy.

IN WITNESS WHEREOF, the undersigned have caused this Supplier Code of Conduct to be executed by their authorized officers.

<u>SUPPLIER</u>	
By:	
Name:	
Title:	
Date:	