



BEMIS CODE OF CONDUCT

The Bemis Code of Conduct lays out the minimum standards we expect our employees, suppliers and business partners to meet. We expect a shared commitment to the welfare of workers and to using resources responsibly and efficiently. Bemis is committed to adopting a continuous improvement philosophy and appropriate management systems to track and implement feedback from partners.

OVERVIEW

At Bemis, we conduct ourselves according to a set of core values that establishes specific personal and professional standards, something we call 'The Bemis Way'. It emphasizes the importance of things like integrity, respect, and safety.

The below Code of Conduct lays out the minimum standards we expect our employees, suppliers and business partners to meet. We expect all of our

suppliers to share our commitment to the welfare of workers and to using resources responsibly and efficiently.

First and foremost, compliance with this Code requires compliance with all laws and regulations in the jurisdictions in which we do business. Beyond legal compliance, this Code is a tool to assist us in fulfilling our responsibility to respect human rights in alignment

with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

For the areas laid out below, Bemis is committed to adopting a continuous improvement philosophy, and appropriate management systems to track, implement, and receive feedback from all stakeholders.

LABOR

FREELY CHOSEN EMPLOYMENT:

Forced, bonded (including debt bondage) or indentured labor, prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. Workers must be provided with a written employment agreement, offer letter, or the equivalent in their native or familiar language. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

CHILD LABOR AND YOUNG WORKERS:

Child labor must not be used. Employees are at least age 16 or over the age for completion of compulsory education or country legal working age, whichever is higher. Employees under 18 are not employed in hazardous conditions.

HARASSMENT AND DISCRIMINATION:

Employees are not subject to discrimination in employment, including hiring, compensation, promotion or discipline, based on gender, gender identity or expression, race, religion, age, disability, sexual orientation, pregnancy, marital status, family status, nationality, political opinion, trade union affiliation, covered veteran status, protected genetic information, social or ethnic origin, or any other status protected by country law. There is to be no harsh and inhumane treatment. Supervisors, managers, or workers may not engage in any Physical Abuse, Sexual Harassment or Sexual Abuse, Psychological Harassment, or Verbal Harassment or Verbal Abuse; nor is there to be the threat of any such treatment.

WAGES, BENEFITS AND COMPENSATION:

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than or equal to regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Where legally mandated, employees shall be provided with either paid or unpaid sick leave and leave for issues relating to domestic violence and/or sexual assault.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING:

Bemis US operations utilizes union labor for manufacturing and globally recognizes and respects the right of employees to freedom of association and collective bargaining. Where the right to freedom of association and collective bargaining is restricted under law, employees may develop parallel means for independent and free association and bargaining.

WORKING HOURS:

Hours of work comply with all applicable laws, and do not exceed 60 hours per week on a regularly scheduled basis. Overtime is voluntary except in extenuating business circumstances and may not be mandated beyond 16 hours per day. Workers are offered at least one day off for every 7-day period.

ETHICS

BRIBERY AND CORRUPTION:

All forms of corruption, including extortion, bribery, embezzlement, theft, or other abuse of power to gain an advantage are prohibited.

GIFTS AND CONFLICTS OF INTEREST:

Gifts, hospitality, and entertainment in a business relationship are appropriate only to foster goodwill and must be of reasonable value. Payments, gifts, kickbacks, or other business courtesies that are offered for an improper purpose or are excessive in terms of frequency or monetary value are inappropriate and may not be given nor received. Any potential conflicts of interest, such as personal relationships with a member of the value stream, must also be disclosed to management for review. In the event a customer or business partner has a stricter, zero-gift policy, the, as applicable, customer or business partner's policy shall apply.

COMPETITION AND ANTI-TRUST:

Fair business dealings must be upheld, and formal or informal agreements with competitors regarding any anti-trust or unfair advantage topics is not tolerated.

PRIVACY AND INTELLECTUAL PROPERTY:

Reasonable privacy expectations of personal information of all, including suppliers, customers, and employees, shall be respected. Intellectual property rights are to be respected, and customer and supplier information safeguarded.

ENVIRONMENT

All required environmental permits, approvals, and registrations are to be obtained, maintained, and kept current, and all associated reporting requirements shall be followed.

Responsible measures to mitigate negative workplace and operational impacts on the environment and community shall be implemented. This includes: integrating sustainability principles into business decisions; improving environmental performance by responsibly using natural resources; reducing waste, increasing energy efficiency, and minimizing greenhouse gas emissions; adopting cleaner production and pollution prevention measures and sustainably designing, developing, and building products and materials.

HEALTH AND SAFETY

A safe and healthy working environment to prevent accidents and injury arising out of, linked with, or occurring during work or as a result of the operation of facilities must be provided. Effective health and safety policies and procedures shall be adopted to cover topics such as Occupational Health, Fire Safety, and Emergency Action, and employees shall be trained on these policies.

FEEDBACK

Workers must be able to express anonymously and safely their concerns about workplace conditions to factory management and other parties without fear of retribution, retaliation, or any other adverse action. Comments must be responded to in a timely manner. Feedback may be provided at the link below.

