



CCL INDUSTRIES  
SUPPLIER CODE  
OF CONDUCT

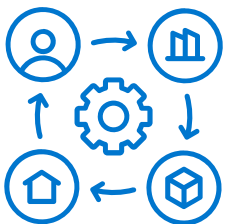
# Supplier Code of Conduct

Since 1951, CCL Industries, Inc. together with its subsidiaries and affiliates (“CCL Industries” or “Company”), comprised of the CCL, Avery, Checkpoint and Innovia segments, enjoyed a reputation of ethical excellence. Our values are the foundation of our success, demonstrating an enduring commitment to ethical business practices, elevated standards, honesty and integrity. They are reflected in our history and define our future. We are proud that the Company is recognized as a trusted partner to our customers around the world.

CCL Industries’ Global Business Ethics Guide (“Ethics Guide”) and Sustainability Report provide an overview of how the Company conducts business as it relates to a variety of corporate policy priorities, including human rights, labor, environment and anti-corruption. These policies align with the principles and missions of internationally recognized human rights frameworks, including the International Labour Organization’s Labour Standards and the Company’s commitment to the United Nations Global Compact.

We recognize our Suppliers are a critical component of upholding these established standards and commitments. This CCL Industries Supplier Code of Conduct (“Code”) establishes requirements for a responsible and sustainable business partnership between CCL Industries and our Suppliers. It is meant to align our policies and programs alongside expectations of Suppliers to deliver high-quality and innovative products, establish a safe and healthy workforce and enhance economic performance and stakeholders’ value.

## We Expect Our Suppliers To:



- ✓ Uphold the Standards covered in this document;
- ✓ Make reasonable efforts to disclose information relevant to these Standards; and
- ✓ Uphold similar requirements in their supply chains and business relationships.

Failure to comply with this Code, to correct violations or to report them in a timely manner may result in corrective actions, up to and including the termination of current business relationships.

### Right to Access

The Company may conduct audits at its discretion to assess facilities and measure Suppliers’ compliance with this Code. All Suppliers, contractors and/or subcontractors may be subject to an assessment that may include, but is not limited to, physical inspections of facilities, interviews with employees and reviews of relevant documentation and records.

The sections of this Code outline the key principles, expectations and responsibilities required by CCL Industries’ Supplier partners.

# 1. Compliance with Applicable Laws and Regulations

In addition to the standards set out in this Code, suppliers shall also comply with all applicable laws, rules and regulations in the countries where they do business.

# 2. Responsible Business Practices, Ethics and Integrity

CCL Industries' Ethics Guide holds the Company to heightened standards around business ethics and integrity worldwide and ensures consideration of our impacts not only to our global employees but also to the communities where our Company operates. Suppliers shall have a similar policy in place that meets or exceeds minimum expectations for regulatory requirements and industry best practices.

## **Anti-Corruption/Anti-Bribery**

Suppliers shall avoid actions that could appear improper and shall operate with honesty, integrity and transparency. All forms of corruption, bribery, extortion and embezzlement are prohibited, including any incentive of perceived value intended to obtain or retain business or secure an improper advantage. Suppliers shall ensure they have adequate systems in place to detect and prevent corruption, bribery, extortion and embezzlement and comply with all applicable local anti-corruption and anti-bribery laws, including the United States Foreign Corrupt Practices Act (FCPA). Any violations of this policy can be reported using the CCL Industries Ethics Hotline. Reports can be submitted at [www.integrity-helpline.com/CCL.jsp](http://www.integrity-helpline.com/CCL.jsp)

## **Sub-Contracting**

CCL Industries does not allow the unauthorized use of subcontracting for our products, services or materials. Suppliers shall discuss and obtain consent prior to the use of subcontractors and

maintain traceability measures concerning the supply of products to the Company.

## **International Trade Regulations and Sanctions**

Suppliers shall comply with applicable trade controls, import and export laws and regulations regarding the products and services provided to the Company. They shall also conduct appropriate due diligence to ensure compliance, including international trade restrictions and sanctions.

## **Antitrust Behavior**

Suppliers shall comply with applicable antitrust and anticompetitive laws in the places where they do business.

## **Confidentiality**

The Supplier agrees to comply with the terms and conditions of any non-disclosure agreements with the Company for the period stated. Confidential information should be used only for the stated business purpose and shall be protected from unauthorized use or disclosure. Suppliers shall guarantee information is legally acquired and ensure the confidentiality of any non-public information received during the business relationship with CCL Industries. Intellectual property, trade secrets and other confidential, proprietary or sensitive information may not be used or disclosed except as shall by law.

(continued)

**2. Responsible Business  
Practices, Ethics and  
Integrity (continued)****Conflicts of Interest & Gifts**

Offers of gifts, favors, entertainment and benefits of modest value are common courtesies in business dealings. These may be offered if there is a legitimate business purpose, if they are consistent with customary business practices and if they are not in violation of any laws or regulations. However, employees shall refrain from offering or accepting

gifts, favors or entertainment if they are intended to prompt or promise preferential treatment.

**Use of Logo and Trademark**

Use of the CCL Industries' logo requires prior authorization and proper notification, unless otherwise indicated as part of a business contract.

## 3. Provide High Quality Goods and Services

Suppliers shall meet or exceed the specifications established, communicated and agreed upon through agreement, purchase order or other applicable contracts, to ensure the integrity of the goods or services provided. Suppliers should establish strict quality controls within their supply chain to ensure all standards are met prior to any shipment. Any changes that may impact the fit, form, or functionality of the product, either directly or indirectly in its final application, shall be communicated to CCL Industries promptly, transparently and proactively.

Suppliers may be subject to periodic review and evaluation by a quality audit visit or self-assessment survey. In this case, the Supplier shall comply with audit requests for the purpose of maintaining the Suppliers' qualifications to sell products to CCL Industries. Cooperation is expected when the activity is appropriate and warranted.

# 4. Environment and Sustainability

## **Responsibility**

Suppliers shall operate in an environmentally responsible manner. CCL Industries is committed to working together with Suppliers to minimize adverse impacts on the environment and achieve sustainability goals through continuous risk assessment and improvement planning. Suppliers are expected to monitor and, upon request, report information on environmental impacts of purchased products, including greenhouse gas emissions. The Company committed to setting science-based targets and aligning with the Net-Zero Greenhouse Gas Standard, which requires a 90% emissions reduction by 2050. Part of the Company's low-carbon strategy includes reducing Scope 3 emissions by engaging Suppliers to set Science-Based Targets.

## **Minimize Impact on Climate Change**

Climate Change is a globally recognized environmental issue. CCL Industries is committed to reducing the environmental impact of our products and services and expects Suppliers to do the same. The Company is committed to working with Suppliers to jointly address negative environmental impacts. In compliance with the Greenhouse Gas Protocol ("GHG Protocol") and as is or will be required by applicable laws and regulations, CCL Industries collects data on and reports on greenhouse gas emissions from Scopes 1, 2 and 3. Suppliers shall support this reporting by annually providing requested necessary information to calculate emissions in a

timely manner. This includes providing emissions data pertaining to business with CCL Industries, annual product quantities by material substrate in weight, Supplier-specific emissions factors and transportation and distribution data. These data shall be accurate, complete, third-party verified and aligned with the reporting standards established by the GHG Protocol.

## **Safe Management of Materials and Waste**

Suppliers shall establish systems to manage and ensure the safe handling of waste, as well as monitor compliance with applicable laws and regulations regarding its collection, storage, transport and disposal. Efforts should be made to properly manage, control and treat waste prior to being released into the environment, to minimize impact on the environment and human health and to further optimize the supply chain. In addition, efforts to minimize shipping and packaging waste should be made without compromising product quality or integrity.

## **Sustainable Water Usage**

Suppliers are expected to review water risks within their own operations and supply chains and create action plans to mitigate water related risks. If applicable, Suppliers are encouraged to set targets related to water usage and to track usage of water in high-risk areas as identified using the World Resources Institute (WRI) Aqueduct tool.

# 5. Labor and Human Rights

CCL Industries' Ethics Guide is the primary policy on workplace practices, human rights, health and safety, ethical conduct and fair business practices for global employees. CCL Industries strictly prohibits child or forced labor within its structure, activities and supply chains. The Company reserves the right to audit its Suppliers for compliance with this policy.

## **Child Labor**

CCL Industries prohibits the work of anyone under the age of 15 within our operations and supply chains. Suppliers shall therefore prohibit the unlawful work of children under the age of 15. In countries where local laws set a higher age for child labor, the higher age shall prevail. Suppliers should take appropriate measures to create effective policies and procedures for compliance throughout their supply chains.

## **Forced Labor, Slavery & Human Trafficking**

Use or support of any form of forced, bonded, slaved, imprisoned labor, involuntary servitude or human trafficking is strictly prohibited throughout CCL Industries' supply chains. Workers shall not be denied freedom of movement or subject to force, fraud, coercion or human trafficking to perform any kind of labor or sex act.

## **Working Hours, Wages & Benefits**

Suppliers shall comply with all applicable hours, wage and benefit laws where they do business. Suppliers shall also meet or exceed local industry standards.

**HOURS** Working hours should comply with national laws and industry standards, whichever provides greater protection and should not exceed the maximum set by internationally recognized standards. Overtime shall be limited to a level that meets humane and productive working conditions, is not excessive, meets local legal requirements and does not exceed maximum hour and rest period laws. Working hours should be consistent with local legal requirements and internationally recognized standards. Suppliers shall establish and maintain a transparent system of records including overtime.

**WAGE & BENEFITS** Suppliers shall pay employees according to applicable laws and prevailing industry standards. Suppliers shall also provide fair and competitive benefits to their employees.

## **Harassment, Abuse and Discrimination**

Suppliers shall provide a workplace free from all forms of violence, including physical, sexual, verbal or psychological abuse. They shall not tolerate corporal punishment, coercion, harassment, inhumane treatment or verbal or physical abuse or threats of any kind.

Discrimination in employment, wages, hiring, training, promotion, termination or benefits based on age, race, gender, color, ethnicity, cultural background, marital status, religion, family status, sexual orientation, disability, gender identity or expression, pregnancy, medical condition, union membership, indigenous status, military service or any other protected class is strictly prohibited.

## **Health, Safety & Well-Being of Employees**

Suppliers shall meet or exceed all applicable health and safety laws, rules, regulations and industry standards to provide a clean, safe and healthy physical and mental environment. Suppliers shall take all reasonable and necessary measures to prevent accidents and injuries. Suppliers shall also conduct regular risk assessments to identify, avoid and mitigate risk associated with accidents, illness and injury potentially preventable through implementation of an effective safety management system and emergency preparedness and response plan.

## **Freedom of Association, Right to Organize & Collective Bargaining**

Suppliers shall recognize and respect employee's freedom of association, collective bargaining and the right to join or refrain from participating in organizations of their choice, where permitted by law. Suppliers shall promote open and direct communication with employees (or their representatives) to allow them to voice concerns and be heard without fear of intimidation, harassment, retaliation or violence.

## 6. Responsible Sourcing

Responsible sourcing mechanisms shall mitigate risk, build trust, strengthen the supply chain and reinforce commitments on long-term sustainable business practice initiatives, which are intended to meet or exceed our customer requirements while minimizing impact to the environment, conserving human rights and safety and driving change.

Adequate notice should be given of changes to specifications, methods, Suppliers, materials/components, manufacturing/supply processes, manufacturing locations or equipment so any impact on CCL Industries' product(s) can be assessed.

### **Conduct raw material due diligence**

Suppliers shall provide transparency of raw material sourcing, identify risks through proper assessment of their supply chain and take appropriate actions to minimize risks in the sourcing of critical raw materials related to the direct or indirect supply of CCL Industries. These include products originating from high-risk areas or toxic or hazardous substances. Suppliers shall enact a system to

document and provide transparency to compliance of their raw material, product or service. Suppliers shall provide compliance statements or other documentation to CCL Industries or designated third-party upon request.

### **Transparency & Traceability**

Suppliers shall create and maintain accurate systems and procedures to ensure and document full traceability from creation through mobility of any material supplied to CCL Industries. Suppliers shall be able to supply all supporting documents and relevant information upon request, to verify the products and services provided to CCL Industries are according to specification, meet or exceed expectations, do not conflict with any part of this Code and for purposes of CCL Industries' or its customers' regulatory compliance needs. Suppliers of paper and other forest materials shall maintain internationally recognized certifications for responsible forestry (i.e., FSC, SFI, PEFC).

## 7. Management and Systems Reporting

Suppliers shall establish, monitor, and continuously improve policies within their own operations and across their entire supply chain to identify and address violations of human and labor rights, as well as negative impacts on communities and the environment. These policies shall adhere to evolving laws and standards and include a mechanism for reporting violations that protects individuals from reprisal, abuse, intimidation and retaliation. Reported violations shall be clearly communicated and corrected in a timely manner.

### **Grievance Mechanisms**

Suppliers are expected to establish and maintain safe, reliable and appropriate systems through

which violations can be reported, investigated and remedied, free from reprisal, abuse, intimidation and retaliation. All reported violations should be swiftly and effectively investigated and corrected. Suppliers should have and make available any reasonable information requested and cooperate fully with any investigation of the commitment or violation of these principles. CCL Industries should be immediately notified, in writing, of any discovery of a violation that may have a negative impact, either directly or perceived, against CCL Industries.