



CODE OF  
**CONDUCT**



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## Dear Team Members

The PaperWorks brand is young, new, and full of possibilities. We have grown quickly through strategic acquisitions, inheriting experience, tenure, and values. As a result, our legacy is diverse, our history is rich, and our brand is a unique blend of tradition and papermaking and converting expertise.

Combining more than 350 years of experience in the industry, it is important that we recognize and protect our heritage – where we come from, how our culture came together, and how our brand has evolved into what we now know as PaperWorks.

Together we will define and shape the company that we want to be, the company that we want to work for, and the company that our customers want to do business with – a company that cares,

competes, and wins. As we continue to grow our brand, define our image, and cultivate our One PaperWorks culture, we will deliver positive experiences and innovative solutions as a trusted partner and brand ambassador.

Our team members are at the heart of everything we do. Working together we can accomplish great things. We all play a meaningful part in our PaperWorks story. Every day counts. Every job is important. Every team member's contribution is significant.

### WE ARE ALL PAPERWORKS.

*Brian Janki*  
President and CEO



OUR CODE IS BUILT ON TRUST

PaperWorks is built on trust and we believe that doing the right thing matters. We know that we earn your trust by conducting our business safely, ethically and with integrity. Our Code of Conduct (the "Code") recognizes our commitment to our "One PaperWorks" culture, holding our professional conduct to the highest possible ethical standards and complying with applicable laws and regulatory requirements. We count on all

team members to follow our Code and make good decisions that embody our Company Values of Safety, Transparency and Community. That means with your trust we live out our Company Purpose of delivering positive experiences and innovative solutions, while working fairly and honestly with our team members, customers, suppliers, vendors, competitors, government entities and the communities we support and serve.

## OUR CODE IS A GREAT RESOURCE.

It provides information to help guide your conduct and inform your decision making. However, it will not answer every ethical or legal question you may have. It is important to use good judgment and to ask team members for help if you are unsure about the right course of action.



## Trust Your Instincts

**IS IT CONSISTENT WITH OUR VALUES?**

**WOULD YOU FEEL OK IF EVERYONE KNEW ABOUT IT?**

**DOES IT BENEFIT OUR TEAM MEMBERS AND OUR COMPANY?**

If you answered yes, it's probably a good decision. If you answered no, it's probably not a good decision. Always seek guidance whenever there is doubt.

## You are PaperWorks

No matter what job you do or where you do it, you are PaperWorks. Make sure your actions always reflect our Values of

## Safety, Transparency and Community.

Follow our Code, policies and the laws and regulations of the countries where we work. Let's all do our part and protect our brand!

If you have a concern, don't just sit there. It can affect all team members and no concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our Code may face corrective action or termination.

Team members who manage other team members have an even greater responsibility to "walk the talk". Leaders should foster a culture of trust and transparency, and support the Code with their actions. Lead by example and make sure team members know the Code is a positive resource for all of us. Team members should feel comfortable and be supported when coming forward with questions and concerns. We support team members for sharing concerns in good faith, and we do not support retaliation for sharing concerns in good faith.



Greensboro, NC



**I suspect someone is violating our Code but I'm not certain. Should I keep my concerns to myself?**



**No. If you have a concern, don't just sit there. It's better to raise a potential concern than to wait and risk harm to other team members or to the Company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.**

## *Let Your Voice Be Heard*



**It's usually more difficult to report a concern about a team member who is in a leadership position. What should I do?**



**It is always important to say something about your concerns even when it isn't an easy thing to do. And it often requires additional courage to speak up when your concerns involve a member of Management. Appropriate actions will be taken to protect the identity of the team member who is sharing the information, as well as the information that is being shared.**



### **We don't tolerate retaliation.**

Team members should feel comfortable reporting potential Code violations. We know that it isn't an easy thing to do and sometimes requires courage. We support team members for doing the right thing. We prohibit retaliation against team members for reporting a violation of the Code in good faith, or participating in an investigation of a possible Code violation. And if a team member believes he or she is being retaliated against in connection with reporting or assisting in the investigation of a possible Code violation, please contact a Code Officer immediately. We will investigate all inquiries thoroughly and discreetly, only disclosing information to those who need it to resolve the issue.

## Team members are here for support

What happens if a team member has a Code related question or concern? In most cases, a Supervisor or Manager should be the first point of contact. He or she is likely in the best position to understand the concern and take the appropriate action. If a team member feels that reporting it to a Supervisor or Manager would put them in an awkward position, or if the concern has already been shared and it's not being addressed appropriately, please reach out to Human Resources, another member of Management, or one of our Code Officers:

### CODE OFFICERS:

#### JAMES KEGLOVITS

Senior Vice President, HR

215.984.7000

[james.keglovits@onepaperworks.com](mailto:james.keglovits@onepaperworks.com)

#### ROBERT REDER

Chief Financial Officer

215.984.7000

[robert.reder@onepaperworks.com](mailto:robert.reder@onepaperworks.com)

Nothing in our Code prohibits a team member from communicating with government agencies about possible violations of federal, state, provincial or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and our Code does not require a team member to notify the Company of any such communications.

## Lighthouse

### A RESOURCE AVAILABLE TO YOU.

We also have an independent, third party operated service that is available to support team members at any time. Team members may contact LIGHTHOUSE via phone or Web to speak up with questions, concerns or allegations of violations of our Code, our policies, our procedures or the law. Team members may submit a report confidentially and have the right to remain anonymous.

### REPORT ONLINE:

[www.lighthouse-services.com/paperwrks](http://www.lighthouse-services.com/paperwrks)

### REPORT BY PHONE:

**1.888.320.0031**

When contacting LIGHTHOUSE —whether by phone or Web—a web-based form will document the information shared, and it will be provided to the Company's Code Officers to ensure that the question or concern can be effectively responded to and with the appropriate expertise. Rest assured—we take this process very seriously and will strive to maintain the confidential nature of submissions to the extent possible and within the limits of the applicable law. After reporting a question or concern, a team member will receive a case number that will be a reference should you want to check back in and receive status updates regarding the submission. We will investigate the facts and circumstances of all claims of Code violations and take prompt corrective action, if appropriate.

## *We are all PaperWorks*

We are committed to equal employment opportunity for all team members and applicants. We support a work environment that fosters diversity, respect and values all people. We do not tolerate discrimination or harassment against team members or applicants on the basis of race, religion, color, sex, age, national origin, mental or physical disability, veteran, marital or family status, sexual orientation, gender identification or any other status or condition protected by applicable laws. We will make hiring, evaluation, training, promotion, disciplinary and other employment decisions without regard to any of these conditions or statuses.



Our team members represent many diverse ideas, experiences and backgrounds, and we recognize the many strengths and talents that diversity brings to PaperWorks. We value the contributions from our team members and believe that everyone should have an equal chance to succeed. Our Company Purpose is highlighted by delivering positive experiences, and we encourage all team members to do their part and support our Company Values and an environment that



**fosters  
diversity  
and respect.**

## Respect Others

**Treat others the way they would like to be treated – the “Platinum Rule”.**



One of my team members emailed an inappropriate joke to me and other team members. I find it offensive, but I don't know if I should approach that team member with my concern. What should I do?



We each have an obligation to ensure that PaperWorks is a safe place to work for all team members, and offensive behavior is not acceptable. In living our Company Value of Transparency, we encourage you to positively communicate with each other for problem solving. If you feel uncomfortable speaking with your fellow team member directly, please reach out to Human Resources, another member of Management, or one of our Code Officers.



I suspect a team member may have a substance abuse problem, and I am worried. What should I do?



Safety is our priority. You should share your concerns with Human Resources to allow PaperWorks the opportunity to address the concern and support our team member.

## Celebrate our diversity

- Listen and be receptive to different points of view.
- Team members should speak up if there is suspected discrimination or harassment based on race, religion, color, sex, age, national origin, mental or physical disability, veteran or family status, sexual orientation, or any other status or condition protected by applicable laws.
- Promote a work environment free of discrimination, harassment, bullying and violent and abusive conduct—whether physical, verbal or visual. Team members can share concerns knowing that the company supports anyone who reports in good faith.

## Safety is our #1 Company Value.

PaperWorks provides a safe and healthy workplace and complies with applicable health and safety laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. We are committed to engaging with our team members to continuously improve health and safety in our workplaces, including identifying hazards and resolving health and safety issues. Play an active role in ensuring the safety of all team members.

## SAFE BEHAVIOR? Promote it!

**UNSAFE CONDITION?** Report it—immediately.

**TRAINING REQUIREMENT?** Comply with it.

**SAFETY GEAR?** Wear it.



**I noticed an important safety device on a machine was not working the way it should. A fellow team member told me it's fine to keep using it anyway, but I decided to talk to my supervisor about it. Did I do the right thing?**



**Yes, keeping the workplace safe for all team members is everyone's responsibility.**



**In the break room, a team member mentioned they had pulled a muscle in their back last night and took some prescription painkillers in the morning before coming to work. The team member said they feel a little bit dizzy, but thinks they'll still be able to get their work done so they're not going to say anything about the pills to their supervisor. Should I speak up?**



**Yes, we have a responsibility to promptly report any safety issues or concerns. The medication could affect our team member's ability to work safely.**

### The detailed policies below can be reviewed separately.

- Environmental, Health & Safety Policy
- Substance-Free Workplace Policy
- Promoting Equal Employment Opportunity Policy
- Non Discrimination and Anti Harassment Policy
- Workplace Violence and Bullying Policy



When it comes to preserving our safe work environment and our community,

## we look out for each other.

Always be alert to what is going on in our environment, and if something doesn't seem right it probably isn't right. Report any concerns you may have regarding threats of potential violence to Human Resources, Management, or to LIGHTHOUSE.

PaperWorks is committed to providing a substance-free workplace. Possessing, manufacturing, distributing, selling, using, or reporting for duty under the influence of alcohol, illegal drugs, or other controlled substances on Company Property is prohibited.

We promote a workplace free of violent and abusive behavior. We have zero tolerance for violent activities, threats, bullying, acting aggressively or being verbally abusive in any manner of interaction, including, but not limited to, contact by email, text, phone, social media and/or in person, toward your fellow team members or others in the workplace, including customers, vendors and visitors. Prohibited conduct includes, but is not limited to:

- **Causing physical injury to another person.**
- **Making threatening remarks including discussing weapons.**
- **Displaying aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.**
- **Intentionally damaging Company Property or the property of another team member.**
- **Possessing a weapon while on Company Property or while on company business.**
- **Committing acts motivated by, or related to, sexual harassment or domestic violence.**

You should promptly inform Human Resources of any protective or restraining order that you have obtained that lists our workplace as a protected area.

Every team member is empowered to take immediate action for the safety of team members regardless of role, title or responsibility. If you see a situation that could put team members at risk, take action, and at all times and in all places, work to keep yourself and your team members injury-free.



**Lately, a fellow team member has been extremely frustrated and seems to be picking arguments with others and talking about violence. I'm fearful. Should I speak up?**



**Trust your gut. If you see something or hear something that feels suspicious, say something. Our priority is to protect all team members from potential harm and provide the reported team member with resources that may be needed.**

## We Value Community and Human Rights.

PaperWorks respects human rights and it is fundamental to our sustainability and the communities we support and serve. In our Company and across our system, we are committed to ensuring that all people are treated with dignity and respect. We are committed to identifying and preventing adverse human rights impacts resulting from or caused by our business activities.

We recognize our impact on the communities we support and serve. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and



Hastings, NE

## fostering goodwill in these communities

through locally relevant initiatives. We respect the rights of every individual and believe that anyone employed by PaperWorks or our suppliers should be treated with dignity and respect, paid a fair wage based on applicable law and assured of safe working conditions. We compensate team members competitively relative to the industry and local labor markets. We strive for full compliance with applicable wage, work hours, overtime and benefits laws. We prohibit the hiring of individuals that are under 18 years of age, unless permitted by applicable laws. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

## Preserve Product Quality and Safety

**When it comes to our products, we never compromise.**

Our Company Purpose says it all: With your trust, we deliver positive experiences and innovative solutions.

### Our customers trust us

to represent and protect their brands, and we want to preserve that trust by consistently and safely producing high quality products and solutions. We care deeply about product quality and safety and make sure our products meet or exceed our own internal standards, as well as the standards set by our customers, industry, and applicable laws and regulations. Product quality and safety starts with all of us, and every team member is empowered to take immediate action if there is an issue. Insist on product quality and safety and follow our rigorous quality-control procedures.



**A team member who works in Quality told me the color on a SKU for a large job was a little off specification but since the plant is so busy, they decided not to raise the issue. The team member said they didn't want to interrupt the production schedule to remake the cartons. Should I say something?**



**Yes. You should say something to ensure the out of specification condition is addressed. It's critical that every product we ship meets our specification and quality standards. Keeping our commitments to our customers is what we do.**



**In the event of a customer complaint or a quality, safety or reliability issue, report it immediately to Management.**

## *Respect Our Partners*

**We are a responsible business partner in all communities.**

We all represent PaperWorks and it is critical that we pursue and maintain responsible sourcing and ethical business relationships including those with our suppliers and vendors. Simply stated it is just good business! We always promote Supplier Diversity whenever possible. Choose the right partners and make decisions objectively, based on factors like quality, service, price, availability and reliability. Let's all do our part to hold our suppliers to our **high standards** and ensure they operate ethically and consistent with our Code of Conduct, our Values and applicable laws and regulations.

We understand and mitigate Supply Chain risk. We pursue opportunities in sustainable and environmentally sound products and suppliers. We require suppliers and providers to be compliant with applicable laws and standards, including, but not limited to:

- **Occupational Health & Safety**
- **Environmental & Waste**
- **Product Safety**
- **Child Labor**
- **Human Rights**
- **Non-Discrimination**
- **Anti-Trust & Corruption**





**I'm the project manager on the team to select a new supplier for PaperWorks apparel. My son runs a small promotional products business and I'd like to give him the contract. Can I do that?**



**No. This creates a conflict of interest and you should remove yourself from the project team and should not seek to influence other team members on the project.**



Baldwinsville, NY

Please contact our Corporate Procurement Department for more information regarding the Procurement Code of Conduct.

We must keep professional and personal relationships separate, to make good business decisions and to **do what is right** for our Company. If you have procurement-related questions about doing business with family and friends, please reach out to Human Resources, another member of Management, or one of our Code Officers.

**For team members who are responsible for a business relationship:**

- Follow our procurement processes and procedures.
- Make sure suppliers know about and intend to comply with our high standards.
- Monitor contractual agreements to make sure that suppliers are meeting their obligations, and we are meeting ours.
- Speak up about any conduct that doesn't meet our high standards.
- Make sure representations, reports and other information submitted on behalf of PaperWorks are accurate and truthful.

## WE ACT WITH INTEGRITY

**LEGAL AND REGULATORY COMPLIANCE**

We operate our business in compliance with applicable laws and regulatory requirements. We are responsible for understanding these laws and regulations as they apply to the duties we perform and for preventing, detecting and reporting violations to a Code Officer. We are truthful and candid in our communications with government agency representatives. In responding to legal, government or regulatory investigations, inquiries or discovery requests, team members will cooperate with PaperWorks by responding to requests for information.

**FAIR COMPETITION AND ANTITRUST**

We outperform our competition safely, ethically and with integrity. We conduct our business in compliance with laws promoting fair competition, including, but not limited to discussions and agreements with competitors, dealings with trade associations, and pricing matters. We do not cooperate with a competitor, supplier or vendor to fix prices, restrain output or damage another competitor, supplier or vendor.

**We will not  
compromise our Values.**



### **LOBBYING**

We may lobby on behalf of issues that affect us and our operations. We conduct our lobbying efforts in compliance with the laws governing lobbying activities.

### **COMPETITIVE INFORMATION**

To remain competitive, we have an obligation to follow industry developments, including obtaining information about our competitors. We obtain information about our competitors through honest, ethical and legal means.

### **INTELLECTUAL PROPERTY**

We respect the rights of others in their intellectual property. We will not violate another's copyrights, trademarks, patents, trade secrets or other proprietary rights, including copying, or using another's intellectual property without license or permission. We will not bring or use intellectual property owned by former employers while performing services for PaperWorks.

## **BRIBES, INDUCEMENTS, KICKBACKS AND PAYOFFS**

We conduct our business safely, ethically and with integrity. We prohibit offering or paying bribes or kickbacks to public officials or private individuals. We also do not accept bribes or kickbacks, including direct or indirect payments, gifts, donations, favors or other gratuities, from an entity or individual seeking an action or inaction with respect to our business. We avoid any appearance of something that could be inappropriate. We also strictly prohibit facilitation payments, commonly referred to as “grease” payments, which are made to a government official for the purpose of expediting routine government actions. Moreover, any business courtesies (e.g., meals, hospitality) must be reasonable in value, not excessive, and appropriate for the occasion in question. You must save all receipts and invoices for business courtesies, and no gifts or business courtesies should ever be given or offered to any government official without prior approval. We are committed to complying with the requirements in the United States Foreign Corrupt Practices Act and the Canadian Corruption of Foreign Public Officials Act. Bribery is always wrong.

## **ECONOMIC SANCTIONS**

The United States and Canadian governments use economic sanctions to further various foreign policy and national security objectives. In the United States, these are primarily administered and enforced by the U.S. Department of the Treasury’s Office of Foreign Assets Control, the U.S. Department of State, and the U.S. Department of Commerce, while in Canada, Global Affairs Canada, the Royal Canadian Mounted Police, and the Canadian Security Intelligence Services have a shared responsibility in administering and enforcing economic sanctions.

Whether or not you are in the United States or in Canada, you must abide by all economic sanctions rules and regulations that the United States and Canada has adopted. Unless otherwise authorized by the U.S. or the Canadian government or generally permitted under applicable laws, all direct and indirect business with a sanctioned country (currently, Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine) or sanctioned or restricted persons is strictly prohibited. If you have any reason to believe that a customer, supplier, vendor, or other counterparty has any connection to a sanctioned country or person, you should raise this immediately to a Code Officer. In addition, you may not refer any business opportunity or inquiry relating to a sanctioned country or person to any other person (including any non-U.S. or non-Canadian company or person), but should instead promptly notify a Code Officer.

**Speak up** if you see or suspect a bribe, a facilitation payment, or a possible transaction involving a sanctioned country. When you see one, or when in doubt, ask another team member for help.



I don't know every team member in my facility. When I enter the facility with my key card, there are sometimes people I don't recognize who come in right after me. I want to be polite but don't want to let in an unauthorized person. What should I do?



**This is something that happens every day in our facilities. We all play an important part in protecting each other and the Company. We also recognize that this responsibility can make some team members uncomfortable. It's totally ok to introduce yourself and acknowledge that you haven't met that person yet. And if it's a customer, supplier or visitor, you can direct them to sign in and get in contact with the team member they are there to see.**



Wabash, IN

### **We protect our Company.**

Our assets include everything that our Company owns and uses to conduct business. Every team member is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use. These assets include things like furniture, equipment, tools, inventory, computer hardware, mobile devices and software. Use of Company Property is limited to Company business and reasonable personal use. Team members should have no expectation of privacy and the Company reserves the right to monitor access and use of Company Property. Make sure use of Company Property doesn't interfere with the work of any team members, and doesn't violate our policies or the law.

## Keep Private Information Private

### Protecting Our Confidential Information

We want team members to have all the information needed to successfully perform their jobs. As a result, team members have access to information concerning our technical, financial and business interests that we do not want other people to know. Team members will

## protect our Confidential Information

and not disclose it, directly or indirectly, to a third party. Team members will also not disclose our Confidential Information to other team members unless it is necessary for them to perform their jobs. Team members will not use our Confidential Information for personal or economic advantage, or for a non-PaperWorks business use. Our obligations with



respect to protecting and maintaining the confidentiality of our Confidential Information apply even after employment with PaperWorks ends.

We also respect the confidential and proprietary information of third parties. We do not share another company's confidential information with others or use it in the performance of work for PaperWorks. Use it only in the way it is meant to be used and don't share it with anyone inside or outside of the Company in an unauthorized manner.

Practice good cybersecurity and protect our networks, computers, programs and data from attack, damage or unauthorized access.

- Follow the privacy laws and regulations of the countries in which we work.
- Safeguard personal information from unauthorized disclosure. Report any data breaches immediately to our IT Department.

**The detailed policy below can be reviewed separately:**

- Confidential Information Policy



I have a daughter studying to be an engineer, and she's interested in how our production processes relate to the concepts she is learning in her classes. Can I give her our work instructions or procedure manual, which explains our production process in detail? My daughter isn't going to use it for a project or share it with anyone; she's just curious.



**No. Our Company's Confidential Information must be protected. Even if the information will not be shared, all our team members have a responsibility to protect it and share it only with people who are authorized to receive it and have a business need to know it.**

Our Confidential Information and Intellectual Property are valuable assets that represent the outcome of significant company investment and years of hard work. Trade secrets, patents, copyrights, trademarks, business plans, engineering ideas, databases, customer lists—help protect these assets, and help

## protect our competitive advantage.

Upon our request at any time or upon termination of employment, a team member will return all Company Property including, but not limited to, computer equipment, security access devices (e.g. keys, badges, fobs), documents, disks or other computer media, and any other equipment and/or materials in their possession or under their control that (1) may contain or be derived from Work Product or Confidential Information or (2) connected with or derived from their services to PaperWorks.

**Please contact Human Resources for more information regarding our Work Product and Moral Rights Waiver Policy.**



**A team member in Accounting received an email from the department supervisor, asking them to wire \$50,000 to an unfamiliar account. With a closer look at the email, the team member noticed it came from an email account in the supervisor's name, but not the usual PaperWorks account. The team member decides this email must be a phishing attempt and deletes it. Was this the right thing to do?**



**Our team member did do the right thing to take a closer look at the email to make sure it really came from their supervisor. However, before deleting the email, our team member should first notify the HelpDesk at [helpdesk@onepaperworks.com](mailto:helpdesk@onepaperworks.com) so they can investigate the situation further and advise how to proceed.**

## Our general “good housekeeping” rules

with respect to protecting our Company Property and Confidential Information:

- Report any Company Property that is damaged, unsafe or in need of repair.
- Don't lend, sell or give away any Company Property unless you're authorized to do so.
- Ensure the physical security of Company Property that's assigned to you.
- Protect your password(s).
- Only install and use authorized software, applications, hardware or storage devices on your computer.
- Access our network only through authorized applications or devices.
- Don't use unlicensed software or make copies of software to use at home or for someone else to use.
- Be alert to phishing scams or other attempts to uncover sensitive personal or Confidential Information.
- Don't open suspicious links in emails, even if you know the source.
- Protect our Confidential Information even if your employment with PaperWorks ends.
- Protect the information of others including the confidential information of companies with which we do business.
- Only share Confidential Information when there is a legitimate, authorized reason for doing so. If sharing with someone outside of PaperWorks, obtain a non-disclosure agreement in advance.
- When in doubt, ask a team member for help!

## AVOID CONFLICTS OF INTEREST

**We don't let personal interests affect business decisions we make on behalf of PaperWorks.**

We all have a duty to act in the best interests of our Company. A conflict of interest can happen anytime something outside of the workplace interferes with working for PaperWorks. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. And being able to recognize a potential conflict can help avoid one. If faced with a situation where a competing loyalty could impair the ability to honestly and impartially deal with your team members, customers, potential customers, partners and vendors, or cause a potential personal benefit at the expense of our Company, this may be a conflict of interest. If you think there is a potential conflict of interest, please report it to a Code Officer immediately.

### Examples of potential conflicts of interest to report to a Code Officer include:

- Personal investments or monetary interests in companies that conduct business with or compete with PaperWorks
- Unless otherwise agreed to by PaperWorks, outside employment that conflicts or competes with PaperWorks
- Developing inventions that compete with our existing or contemplated products or services
- Outside board memberships that conflict with the services you provide or obligations to PaperWorks
- Family/personal relationships at work, including a romantic relationship with a direct report, supervisor or manager, and hiring, supervising or making employment decisions related to family members or personal friends
- Accepting gifts, favors or other business courtesies if there is likelihood that they might be thought to improperly influence a team member's judgment
- Deriving a direct or indirect benefit from contracts entered into by PaperWorks over which a team member can or may influence decisions

If PaperWorks determines that your actions or activities constitute a conflict of interest, we will take appropriate action to remedy or remove the conflict of interest. In certain circumstances, the appropriate action may include termination of your employment.

**Words matter,** words have power and words can have both positive and negative consequences for our Company. In order to ensure that accurate and complete information is conveyed to the public, regulatory authorities and others, we have designated individuals to serve as our official company spokespersons. Unless authorized to do so, please do not make any public statements on behalf of PaperWorks.

In order to protect the privacy and the safety of our team members and the Company,

**WE DO NOT:**

- Copy, distribute, use or print materials that are protected by copyright, including articles, photographs, graphics, publications, music, images or software, in violation of copyright laws.
- Take unauthorized photographs or recordings on Company premises. Team members and visitors are prohibited from using cameras or any other video or audio recording devices, including the cameras in mobile devices, unless authorized by the Company.
- Use offensive or harassing statements or language that disparage others based upon their race, religious or political beliefs, color, sex, age, national origin, mental or physical disability, veteran or family status, sexual orientation, or any other status or condition protected by applicable laws, or would constitute a threat, intimidation, harassment or bullying.
- Intentionally visit hate or other inappropriate websites.
- Gamble or engage in an activity that violates the law in any jurisdiction where we conduct business.
- Send, receive, print or disclose Confidential Information unless authorized by the Company.
- Use a PaperWorks electronic email address, the PaperWorks name or a PaperWorks logo when registering for a third-party service or on a non-PaperWorks website, including social media websites such as Facebook, LinkedIn, Twitter, Snapchat, Instagram, etc. except with express written permission from the Company.



**A friend asked me if I can confirm an internet blog which claimed PaperWorks is developing a new, uniquely designed type of paperboard. Should I share what I know?**



**No. Product plans, development, and launch information is confidential and proprietary information of PaperWorks and should not be discussed with anybody outside of the Company unless the information has already been made public by PaperWorks.**



**I use Instagram and Facebook. What are some examples of social media use that violates our policies?**



**When using social media, you should never use or post photos, images, videos or audio clips of our facilities, and/or PaperWorks logos, trademarks or copyrighted materials without express permission from our Company. Always represent or leave the impression that the views you express are your own.**

Please refer all governmental, regulatory, media inquiries and public requests for information to our Marketing Department at [brand@onepaperworks.com](mailto:brand@onepaperworks.com).

### **Using Social Media – are these updates ok to post?**

1. Is anyone looking for a new VP of Customer Service? My boss is about to resign and she's looking for a new opportunity.
2. The development of this new grade of paperboard is INSANE! The whole mill seems to be working on the surprise launch.
3. PaperWorks is hiring! Check out these great opportunities on the Company's website.

#1 and #2 are not appropriate to post because they reveal Confidential Information about our Company. #3 is ok to post because it contains only publicly available information about our Company.

If a team member is involved in blogging, even if not hosted on the facilities and/or equipment of PaperWorks, please avoid making reference to PaperWorks on a blog and comply with this Code and other PaperWorks policies with respect to our Confidential Information. Clearly state that any opinions expressed about our Company are personal and do not reflect those of our Company.

*We all play an essential role*

### **BE A GOOD CITIZEN**

We strive to deliver innovative solutions to the world while making it a better place for us all. We believe that doing the right thing matters and will not be satisfied until our protection of our team members and the environment is unmatched. We are committed to compliance with all applicable environmental laws and regulations. We seek out continuous improvement for the environment through how we use energy and natural resources, manage waste, recycle and reduce the impact of our facilities. We have developed market differentiating products in the area of sustainability and environmental responsibility which sets us apart from our competitors, and we are very proud of that. We encourage all team members to pursue ways to improve the environment. Simply stated, being a good world citizen is just good business!

*We have the power to improve our world*

### **MAKE A DIFFERENCE**

We are grateful that our team members live our Purpose in delivering positive experiences through volunteering and contributing to charitable causes. We encourage all team members to support and serve the communities in which we live, work and play and to give back. Whether it's through tutoring and mentoring programs, donating food to a local food bank, contributing books to support literacy campaigns, giving blood to support neighbors in need, tackling homelessness in our backyards, or donating money to countless worthy causes, our team members live our Value of Community and make a difference every day and we take great pride in that. When our local communities thrive so do we!





## BELIEVING IN OUR PURPOSE



Our success is up to all of us. When we talk about “delivering positive experiences and innovative solutions” we mean working together with our team members in a high trust environment and with the highest standards of integrity. And we build that trust and uphold those standards every day –

**shift to shift,  
roll to roll,  
carton to carton,  
brand to brand.**

We encourage all team members to do everything possible to bring those positive experiences and create those innovative solutions every day for our team members, customers, suppliers, and our communities that we support and serve. If you have any questions about our Code, please contact a member of Human Resources or Management.

*Purpose*



We support the rights of our team members to speak out publicly about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Our Code is not intended to preclude or dissuade team members from engaging in activities protected by provincial, state or federal law, including the National Labor Relations Act and the Ontario Labour Relations Act, such as: discussing wages, benefits or terms and conditions of employment; forming, joining or supporting labor unions; bargaining collectively through representatives of their choosing; raising complaints about working conditions for their and their fellow team members' mutual aid or protection; or legally required activities.

If you live in a country, state or province where an obligation described in this Code is unlawful, it does not apply to you. However, the remaining provisions in this Code will remain enforceable. For team members covered under a Collective Bargaining Agreement, the employment terms set out in this Code work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with the Company. Wherever employment terms in this Code differ from the terms expressed in the applicable collective bargaining agreement with the Company, team members should refer to the specific terms of the respective Collective Bargaining Agreement, which will control.

PaperWorks includes PaperWorks Industries, Inc., Specialized Packaging Flexo LLC, The Specialized Packaging Group Inc., Gibraltar Packaging Group Inc., Strathcona Paper LP, Boehmer Box LP, The Standard Group LLC and TSG II LLC (collectively, "PaperWorks" or the "Company"). This Code applies to all team members of the Company inclusive of Baldwinsville, NY, Fort Washington, PA, Greensboro, NC, Hastings, NE, Kitchener, ON, Louisville, KY, Mt. Gilead, NC, Strathcona, ON, Wabash, IN and all remote or home-based locations in the United States and Canada.