



Manufacturer
UN Certifier
Designer
Distributor

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SUPPLIER CODE OF CONDUCT

C.L. Smith conducts its business based on principles and commitment to Quality and Safety, Fair Business Practices, Human Rights and Sustainability per this Supplier Code of Conduct. This Code outlines our core principles and values; and we require adherence to them from our employees, Suppliers, and all business partners when performing business dealings. As such, meeting these requirements is significant when C.L. Smith is deciding, initiating, or continuing a business relationship.

Quality and Safety

Product Quality

C.L. Smith has established goals of striving to meet or exceed industry standards for product quality. With our customer and supplier partners, we aim to achieve success in packaging products that perform as necessary with appropriate quality measures in place. Continuous improvement processes drive improved results for our customers.

Quality of Our Service

C.L. Smith takes tremendous pride in the quality of our services. As a leading provider of packaging goods across many industries, C.L. Smith has gained a stellar reputation for services performed. It is our goal to earn the long term loyalty of our customers through our service. Expectations of our associates are to always think of the customer first by providing best in class service.



Supplier Code of Conduct (cont.)

People Safety

The workplace our partners provide must be safe. Employees and contractors must be made aware of safety rules and instructed to apply them at all times, while at work, visiting customers or traveling. There is a process in place to manage safety incidents.

Process Safety

It is important that our partners systematically assess and control the operational risks of hazards, injuries, waste or harm resulting from their activities for us, such as research, manufacture, and transport. Their employees and contractors must follow safety procedures, and safety risks and incidents must be reported and controlled promptly.

Product Safety

Our partners must comply with product safety regulations, label products properly and communicate product-handling requirements. People exposed to products manufactured for and supplied to C.L. Smith must be protected from exposure to hazardous substances. Products supplied to C.L. Smith, and the raw materials used to manufacture these products, meet all applicable product regulatory requirements.

Business Practices

Our business partners are expected to comply with all laws and regulations applicable to the business they conduct for C.L. Smith. They are expected to apply the principles set forth in this Code or apply equivalent principles.



Supplier Code of Conduct (cont.)

OUR CORE VALUES



Honest Business Conduct

We expect that all of our business partners conduct business with honesty and integrity. They will not make, offer or authorize bribes, or conduct any form of unethical business practice.

Fair Competition

Our partners compete fairly and comply with competition and anti-trust laws. They do not enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position.



Supplier Code of Conduct (cont.)

They do not offer products or services to or on behalf of C.L. Smith in a misleading way.

Intellectual Property and Confidential Information

We expect our partners to respect intellectual property rights, including those of C.L. Smith. There must be appropriate measures to prevent disclosure or unauthorized use of C.L. Smith confidential information made available to them.

Personal Data

Our partners protect the personal data of C.L. Smith's employees and use this data for legitimate and authorized business purposes only. They are to be clear on when and how they collect, use or share any and all personal data. They continuously take appropriate security measures to protect such data.

Conflict of Interest

Decisions our partners' employees take with regard to C.L. Smith business transactions may not be influenced by personal or private interests. Personal or friendly relationships with a C.L. Smith employee may not be used to influence the employee's business judgment. If an employee is related to a C.L. Smith employee, and this may represent a potential conflict of interest in a transaction or business relationship, our partners must disclose this fact to C.L. Smith or ensure that the C.L. Smith employee does.

Company Resources

If they use or have access to C.L. Smith resources, including people, systems, networks and facilities, our partners must use these resources appropriately, in accordance with C.L. Smith instructions and for their intended business purpose only.

Record Keeping

We expect our partners to keep accurate, complete and up-to-date records on their transactions with C.L. Smith. These records must be retained in accordance with applicable laws.



Supplier Code of Conduct (cont.)

Preventing Fraud

It is expected that our business partners must have appropriate controls designed to prevent any type of fraudulent activities. Transactions are to be properly audited for compliance.

Proper Communication

Transparent and timely communication with us is fundamental in continuing a strong relationship. Our partners will not disclose C.L. Smith confidential information without permission irrespective of any contractual obligations.

Employment Relationships

The business partner's employees hired and retained should be suitable for the job. People are not employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed. The people our partners deal with are treated with dignity and respect. Our business partners do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age. Working hours and remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required. Individual rights to freedom of opinion and association, including the right to collective bargaining, are respected.

Sustainability

C.L. Smith's Responsible Sourcing Program guides how we source and produce quality products for our customers through sustainability for our environment and



Supplier Code of Conduct (cont.)

care for our employees. We hold in high importance where our products are sourced and the process in which they are made.

Companywide, C.L. Smith shall have a positive impact on people, communities, and the planet as part of our sourcing activities. Together we are able to support and contribute to the creation of shared value through our continuous improvement efforts used to achieve these Standard requirements.

Our partners comply with all relevant environmental laws and ensure that necessary permits are in place. They are committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission, and noise. They care about the communities they operate in and listen to their concerns.

Suppliers shall minimize any adverse impact of its operations on the environment and demonstrate continuous improvements in minimizing these impacts.