

Anti-Corruption and Anti-Bribery Policy

Effective Date: January 2024
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Human Resources Manager
Approved By: Chief Operating Officer (COO)

Scope

This policy applies to all employees, temporary employees, consultants, contractors and any other third parties, which include customers and vendors.

Anti-Corruption and Anti-Bribery

Diamond Packaging is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure corruption and bribery is prevented. Diamond has zero-tolerance for bribery and corrupt activities. We are committed to act professionally, fairly, and with integrity in all business dealings and relationships.

This policy applies to all employees, temporary employees, consultants, contractors and any other third parties, which include customers and vendors. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value to induce or influence an action or decision. A bribe refers to any inducement, reward, or item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe, and they accept it, they are also breaking the law. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party. If they are uncertain about whether something is a bribe or a simple act of hospitality, they must ask a Diamond manager.

Diamond Packaging may accept normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meet the following requirements:

1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
2. It is not made with the suggestion that a return favor is expected.
3. It is in compliance with the law.
4. It is given in the name of the company, not in an individual's name.
5. It does not include cash or a cash equivalent.
6. It is appropriate for the circumstances (giving small gifts around the holidays or as a small thank you to a company that has helped out with a large project).
7. It is given/received openly, not secretly.
8. It is not above the value of \$50, unless consent is given by Management.

9. It is not given to/accepted from a government official or politician without the consent of Management.

As good practice, gifts given or received should always be disclosed to Diamond Management. If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Diamond Packaging, you should raise your concerns as early as possible to Human Resources.

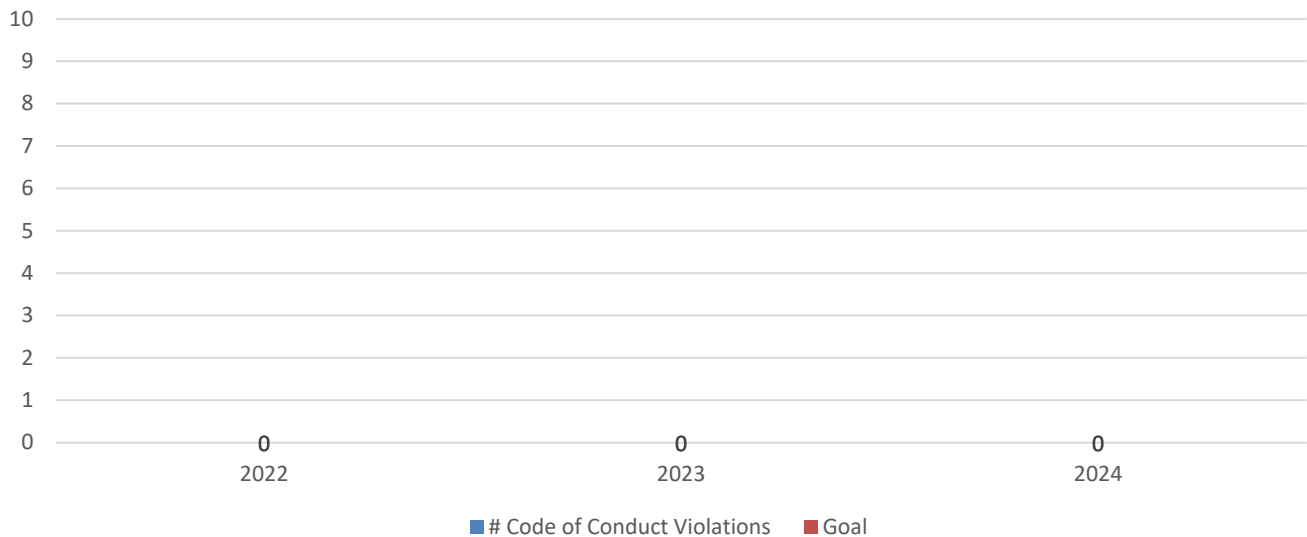
Key Performance Indicator (KPI)

To monitor progress on implementation measures, Diamond tracks the following KPI:

Code of Conduct Violations

This includes:

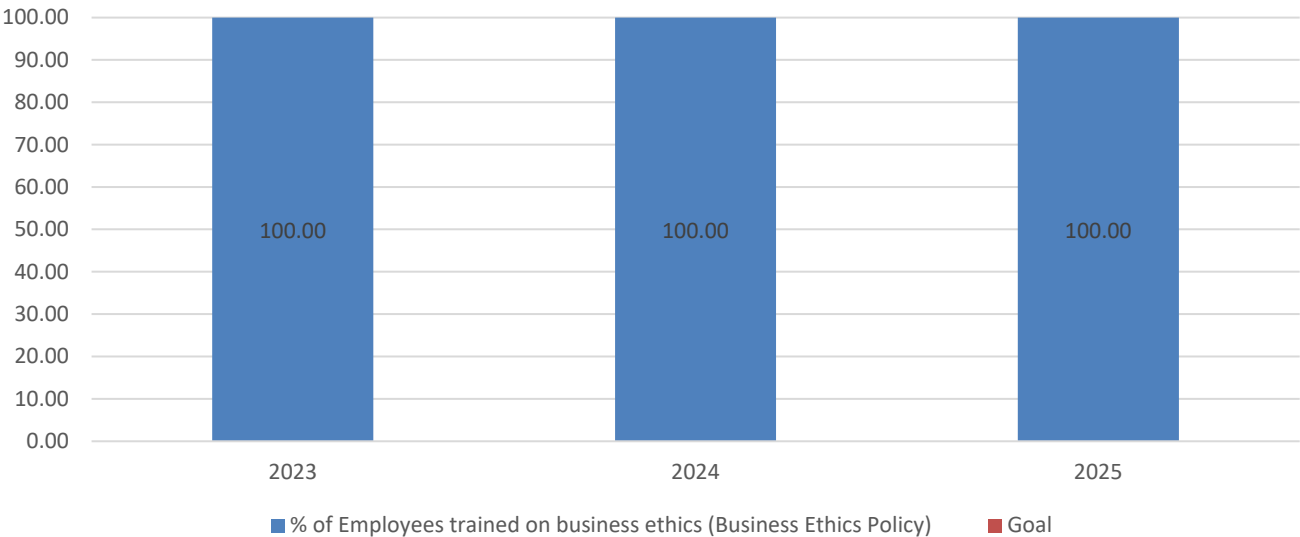
- Business Ethics
- Corruption
- Conflict of interest
- Fraud
- Information Security
- Anticompetitive practices
- Child Labor
- Forced Labor
- Human Trafficking
- Fundamental Human Rights



Diamond is committed to upholding the highest standards of business ethics and integrity. Our values and principles guide every decision we make, ensuring that we operate with transparency, fairness, and accountability. Code of Conduct violations extend to employees, interns, applicants, contractors, suppliers, consultants, and any other non-employees providing services in the workplace. Diamond’s **Code of Conduct Policy** is found in the Employee Handbook. This policy is signed off on by all employees.

See Diamond’s Employee Handbook for information on Governance, Review Mechanism, and Scope.

Employees Trained on Business Ethics (Business Ethics Policy)



Diamond is committed to upholding the highest standards of business ethics and integrity. Our values and principles guide every decision we make, ensuring that we operate with transparency, fairness, and accountability. Diamond’s **Business Ethics Policy** is found in the Employee Handbook. This policy is signed off on by all employees. Diamond’s Business Ethics Policy is also publicly available in its GRI-aligned 2025 Sustainability Report and on the ESG Policies web page of its [website](#).

Governance Structure

The implementation and oversight of this Anti-Corruption and Anti-Bribery Policy is governed through the following structure:

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Reports violations to executive leadership

Marketing Director / Sustainability Lead

- Overall accountability for ESG reporting
- Authors annual Sustainability Report for customers and external stakeholders, including CDP, EcoVadis, UN Global Compact

Policy Review and Continuous Improvement

Annual Review Process

- This policy will be formally reviewed annually in Q1 of each calendar year
- Review will assess progress against quantitative target
- Updates will be incorporated based on:
 - Regulatory changes relating to ethics or bribery
 - Evolution of industry best practices
 - Performance data from the previous year

Trigger-Based Reviews

- Policy may be reviewed outside the annual cycle when:
 - New legislation becomes available
 - Stakeholder concerns necessitate policy adjustments

Documentation and Communication

- All policy updates will be documented with a date or version control
- Updated policies will be communicated to all suppliers within 30 days
- Training will be provided to all Diamond employees on any material changes

Performance Monitoring

- Annually: Track number of Code of Conduct violations
- Annually: Track Employees trained on business ethics
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- Participate in industry benchmarking to identify improvement opportunities