

Business Ethics Policy

Effective Date: January 2024
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Marketing Director / Sustainability Lead
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.

Business Ethics

At Diamond Packaging, we are 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. We believe that ethical conduct is foundational to our success and reputation in the Containers & Packaging industry. Our core values are deeply embedded in our culture and reflect who we are as a company. They guide how we treat our employees and suppliers, serve our customers, and contribute to the broader community.

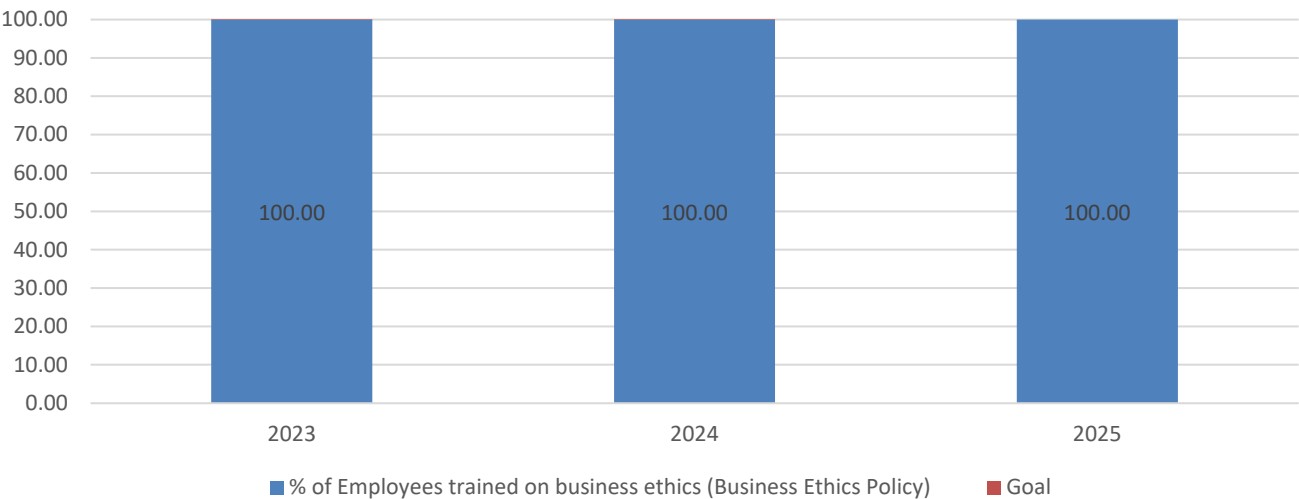
Our internal ethical codes serve as a roadmap for all employees to navigate complex situations with integrity. These codes encompass guidelines on conflicts of interest, confidentiality, anti-bribery, and anticorruption practices. We expect every employee to adhere to these standards diligently and to report any unethical behavior they encounter. Training programs are conducted regularly to ensure that all employees understand and can effectively apply these ethical principles in their daily work.

To support our commitment to business ethics, Diamond has established a robust infrastructure that includes clear accountabilities and grievance procedures. Diamond's senior management team is responsible for overseeing the implementation of this policy and ensuring compliance across the organization. Employees can report concerns or violations through multiple channels including anonymous suggestion boxes or directly to management without fear of retaliation. All reports will be investigated thoroughly and impartially, with appropriate corrective actions taken as necessary. By fostering an environment where ethical behavior is recognized and upheld, Diamond aims to build trust with all stakeholders and contribute positively to society at large.

Key Performance Indicators (KPIs)

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

Employees Trained on Business Ethics (Business Ethics Policy)



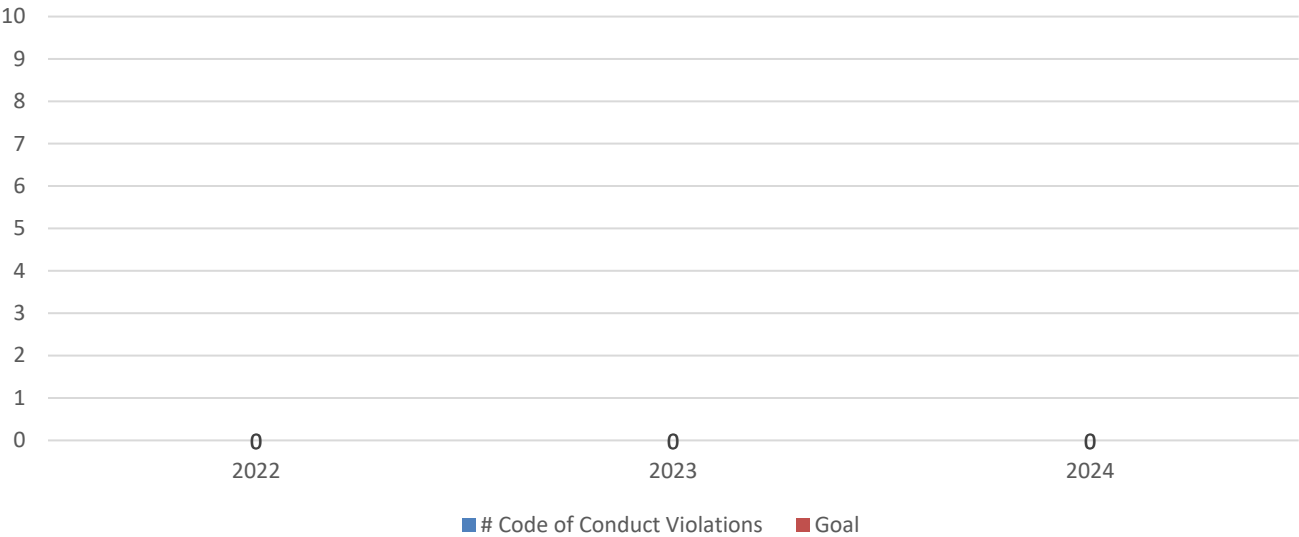
Diamond is committed to upholding the highest standards of business ethics and integrity. Our values and principles guide every decision we make, ensuring that we operate with transparency, fairness, and accountability.

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 **Sustainability Report** and on the ESG Policies web page of its [website](#).

Code of Conduct Violations, including:

- 1. Business Ethics
 - a. Corruption
 - b. Conflict of interest
 - c. Fraud
 - d. Information Security
 - e. Anticompetitive practices
- 2. Child Labor
- 3. Forced Labor
- 4. Human Trafficking
- 5. 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.

Suppliers Signing Supplier Code of Conduct Policy, addressing:

- 1. All applicable laws, regulations
- 2. All environmental laws
- 3. Safe and healthy work environment
- 4. Labor practices
- 5. Forced labor, child labor
- 6. Discrimination
- 7. Ethics
- 8. Compliance



Diamond is committed to conducting procurement in an ethical, legal, and socially responsible manner. Diamond expects its suppliers to share this commitment. All Diamond suppliers must meet the minimum requirements outlined in the Supplier Code of Conduct document to do business with Diamond. This document is sent to all major Diamond suppliers, requesting them to sign and return to acknowledge compliance with these standards. All responses are tracked in Diamond’s SharePoint database with the following status – Complete, Complete (no exception), Pending, N/A – and date completed.

Governance Structure

The implementation and oversight of this Business Ethics 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 business ethics
 - Evolution of industry best practices
 - Performance data from the previous year

Trigger-Based Reviews

- Policy may be reviewed outside the annual cycle when:
 - New legislature 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: Evaluate Code of Conduct compliance
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- Participate in industry benchmarking to identify improvement opportunities