

Child Labor Policy

Effective Date: January 2026
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Human Resources Manager
Approved By: Chief Operating Officer (COO)

Scope

This Child Labor Policy applies to all Diamond Packaging facilities, operations, and employees, including temporary workers, contractors, and consultants. It governs all internal labor practices, including hiring, workforce management, and operational procedures, to ensure that no child labor is present within our direct operations.

The policy also applies to all suppliers, vendors, and business partners who provide materials, products, or services to Diamond. This includes, but is not limited to, those involved in the sourcing of paperboard, foil, inks, adhesives, and other production materials. All individuals involved in supplier engagement are required to adhere to this policy and integrate its principles into their decision-making processes.

Diamond enforces a zero-tolerance policy toward any form of child labor. Compliance with this policy is a mandatory requirement for all employees, contractors, and business partners. Any confirmed violation, whether within our operations or supply chain, will result in immediate corrective action, which may include suspension or termination of employment or contract, removal from the approved supplier list, and/or escalation to relevant authorities as required by law. In cases involving actual or suspected child labor, Diamond will work with relevant stakeholders to ensure responsible remediation that prioritizes the best interests of the child.

Child Labor

At Diamond Packaging, we are committed to upholding the highest ethical standards and ensuring that our operations and supply chain are free from child labor, forced labor, and human trafficking. We recognize the inherent rights of children to be protected from economic exploitation and hazardous work conditions. As a company in the Containers & Packaging industry, we hold ourselves accountable to international conventions such as the United Nations Convention on the Rights of the Child and International Labour Organization (ILO) Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour). Our policy is designed to ensure compliance with these standards across all our operations and partnerships.

To this end, Diamond strictly prohibits the employment of individuals under the age of 18 for any work that is classified as hazardous or detrimental to their health, safety, or moral development. For non-hazardous roles, we adhere to a minimum employment age of 18 years, in line with applicable national laws and regulations. We conduct thorough age verification checks during our hiring processes to ensure compliance with these standards. Furthermore, we require all suppliers, contractors, and business



partners to adhere to these same principles. Any violations discovered within our supply chain will result in immediate corrective action, which may include termination of contracts or partnerships.

Diamond is also dedicated to promoting education and development opportunities for young people. We support community initiatives aimed at improving access to quality education and vocational training for children and adolescents. Additionally, we provide training for our employees on recognizing signs of child labor and understanding their responsibilities under this policy. By fostering an environment where child labor is unequivocally condemned and prevented, Diamond Packaging aims to contribute positively towards global efforts in eradicating child labor while ensuring that all children have the opportunity for a safe and prosperous future.

Labor Practices and Human Rights Measures

Supplier Code of Conduct Compliance (major suppliers)

- Require 100% of suppliers to sign and commit to Diamond's Supplier Code of Conduct by Q4 2026
- Establish zero-tolerance policy for child labor, forced labor, and workplace discrimination

Audit and Verification Program

- Conduct on-site or virtual audits of five (5) major suppliers every year
- Utilize third-party audits (e.g., EcoVadis, FSC) for independent verification of labor practices (paperboard, foil)
- Implement corrective action plans for suppliers with identified non-compliance issues
- Establish escalation procedures, including certified supplier status for repeat violations

Environmental Sustainability Measures

Supplier Assessment and Selection

- Implement a sustainability scorecard system for evaluating 100% of new and existing suppliers (paperboard, foil) by Q4 2026
- Prioritize suppliers with third-party environmental certifications (FSC) requiring adherence to the FSC Core Labor Requirements

Sustainable Materials Sourcing

- Maintain and expand FSC Chain of Custody certification
- Conduct annual verification of supplier certification status (FSC)

Continuous Improvement Measures

Data Collection and Analysis

- Maintain Supplier Code of Conduct compliance data management system for all major suppliers
- Establish baseline metrics for all key performance indicators by Q4 2026
- Conduct annual supply chain risk assessments to identify emerging issues

Stakeholder Engagement

- Solicit feedback from customers on expectations relating to child labor, forced labor, and human trafficking
- Engage with industry associations to stay current on best practices
- Participate in collaborative initiatives for supply chain best practices

Innovation and Technology

- Evaluate emerging technologies that support sustainable procurement goals
- Pilot new approaches with select suppliers before broader implementation
- Share successful practices across supplier network

Key Performance Indicators (KPIs)

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

Process KPIs

- Policy training completion: Number (#) Code of Conduct Violations | Target: 0
- Supplier engagement: Percentage (%) of major suppliers signing Supplier Code of Conduct Policy, which includes labor and human rights clauses | Target 100%

These KPIs are reported monthly (for critical metrics), quarterly (to Green Team), and annually (in Diamond Sustainability Report).

Code of Conduct Violations



Suppliers Signing Supplier Code of Conduct Policy



Governance Structure

The implementation and oversight of this Sustainable Procurement Policy is governed through the following structure:

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Reports sustainability metrics to executive leadership and Green Team quarterly
- Assists with Social Compliance audits

Supply Chain Manager

- Overall accountability for sustainable procurement strategy and performance
- Reports sustainability metrics to executive leadership and Green Team quarterly
- Approves major supplier partnerships and certifications
- Day-to-day implementation of sustainable procurement practices
- Leads supplier evaluations and selection processes
- Maintains supplier scorecards and compliance documentation
- Validates product specifications meet sustainability standards
- Verifies supplier certifications (FSC)

Supply Chain Management Team

- Conducts supplier audits and assessments
- Identifies opportunities for supply chain improvements

Quality Assurance Department

- Verifying supplier certifications (ISO, FSC)
- Assisting with Social Compliance audits

Marketing Director / Sustainability Lead

- Overall accountability for ESG reporting
- Reports sustainability metrics to executive leadership and Green Team quarterly
- Authors annual Sustainability Report for customers and external stakeholders, including CDP, EcoVadis, UN Global Compact

Cross-Functional Sustainability Committee (Diamond's Green Team)

- Reviews progress against targets quarterly
- Recommends policy updates and new initiatives
- Ensures alignment with Diamond's Sustainability Report

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 targets and qualitative objectives
- Updates will be incorporated based on:
 - Regulatory changes in environmental and labor standards
 - Evolution of industry best practices
 - Stakeholder feedback (customers, suppliers, employees)
 - Performance data from the previous year

Trigger-Based Reviews

- Policy may be reviewed outside the annual cycle when:
 - Significant changes occur in certification standards (FSC)
 - Major supply chain disruptions require response
 - New ESG technologies become 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 human resources and procurement staff on any material changes
- Public-facing updates will be reflected in the annual Diamond Sustainability Report

Performance Monitoring

- Quarterly: Track Number of Code of Conduct violations
- Quarterly: Track Supplier Code of Conduct compliance percentages
- Quarterly: Review supplier audit results and compliance status
- Annually: Evaluate overall environmental and social impact metrics
- Annually: Evaluate Supplier Code of Conduct compliance
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- Engage third-party audits to verify compliance with policy standards annually
- Participate in industry benchmarking to identify improvement opportunities
- Maintain transparency through public reporting of key metrics