P.O. Box 23620
111 Commerce Drive
Rochester, NY 14692

Environmental Stewardship Policy

Effective Date: January 2026
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Marketing Director/Sustainability Lead
Approved By: Chief Executive Officer (CEO)

Scope

This Environmental Stewardship policy applies to all the state-of-the-art technologies, sustainable design methodologies, and responsible material procurement strategies deployed by Diamond Packaging across all relevant operations in folding carton manufacturing that comply with internal and external environmental goals.

This policy establishes guidelines ensuring our packaging is both innovative and sustainable without compromising beauty and reducing our environmental impact by identifying and executing best practices in our procurement and manufacturing processes.

Policy Statement

Diamond is committed to working toward a cleaner environment. The company developed its greenbox initiative to research, design, and implement packaging solutions that are innovative and sustainable.

The initiative balances business with environmental considerations by promoting sustainability in all aspects of package production.

The core of the initiative – designs, materials, and methods – represents a comprehensive approach to packaging that minimizes environmental impact throughout the supply chain.

Sustainability optimizes the value of packaging through every phase of its life cycle, from design to end of use. Through creative design, careful material selection, and best practices at the plant level, Diamond is able to minimize waste, reduce energy use and emissions, reduce shipping costs, and increase efficiencies – all of which support a sustainable use of resources and cultivate a positive emotional connection to the brand.

The Diamond greenbox initiative is one more way we plan to surpass our customers' expectations today, tomorrow, and into a greener future.

Communication

Any environmental stewardship initiatives and progress will be transparently communicated throughout all stages within the company's supply chain management and manufacturing processes.

Implementation Measures

To achieve our environmental stewardship objectives, Diamond has established the following concrete measures:

Environmental Stewardship Measures

Greenbox Initiative

- Designs utilizing recyclable or recycled paperboards (many FSC®-certified), and manufactured using 100% clean, renewable wind energy, in a Zero Waste to Landfill (ZWL) and Carbon Neutral (Scope 1 and Scope 2) facility.

Material and Supply Chain Management

- Diamond is Forest Stewardship Council (FSC) Chain of Custody certified and reflects a commitment to making more environmentally and socially responsible supply chain decisions.
- Diamond purchases paperboard that comes from FSC- or SFI-certified sources.

Wind Energy

- Since 2007, Diamond has been purchasing and retiring Green-e certified wind-generated renewable energy certificates (RECs) to match 100% of our electrical energy consumption, becoming one of the first U.S. based folding carton suppliers to do so.
- Diamond purchases approximately 8,400,000 kilowatt hours (kWhs) of renewable energy credits annually.

Climate Action Reserve (CAR) / Ambitious Climate Results (ACR)

- In 2021, Diamond announced a multi-year commitment with **3Degrees** to purchase Climate Action Reserve (CAR)-certified carbon offsets to reduce its carbon footprint.
- In 2025 Diamond entered into a multi-year agreement with **Climate Impact Partners** to purchase Ambitious Climate Results (ACR)-certified carbon offsets aimed at reducing its carbon footprint.
- With these purchases, Diamond is taking a significant step on the path to carbon neutral by offsetting its Scope 1 emissions. (Its Scope 2 emissions are already offset through its long-term commitment to wind energy.)
- As the premier carbon offset registry for the North American carbon market, the Climate Action Reserve encourages action to reduce greenhouse gas (GHG) emissions by ensuring the environmental integrity and financial benefit of emissions reduction projects.
- As a leading global carbon crediting program operating in global compliance and voluntary carbon markets, ACR engages actively in a broad range of industry initiatives to help shape the development and growth of high-integrity carbon markets.

Waste Recycling

- Diamond maintains its zero waste to landfill (ZWTL) status as a part of our demonstrable effort to design and produce packaging within a restorative and regenerative circular economy

Continuous Improvement Measures

Data Collection and Analysis

- Diamond tracks progress on sustainable sourcing of paperboard products and sets targets to increase usage annually
- Adopt an array of metrics to measure the performance of our energy efficiency, waste recycling, and process improvement initiatives
- Establish baseline metrics for all key performance indicators by Q4 2026
- Maintain compliance with the Ten Principles of the UN Global Compact, and GHG Protocol guidelines to promote best practices in assessing and setting targets

Stakeholder Engagement

- Solicit feedback from customers on environmental stewardship expectations
- Provide greater transparency and credibility through third-party verification registries
- Engage with industry associations to stay current on best practices
- Participate in collaborative initiatives for supplier engagement and environmental stewardship

Innovation and Technology

- Incorporates best practices at the plant level and employs comprehensive approach to energy efficiency
- Continue our commitment to sustainable design methods considering factors such as product protection, usability, billboard space, and first moment of truth (FMOT)
- Capturing the essence of luxury brands through more sustainable in-line converting methods

Key Performance Indicators (KPIs)

To monitor progress on environmental stewardship, Diamond tracks the following KPIs:

Environmental KPIs

- Certified board usage: increase the use of certified paperboards by 1% per year over the next 10 years (10% total), based on a 2012 baseline
- Renewable or recycled paperboard usage: over 99% of all packaging was made from renewable or recycled paperboards, many FSC-certified
- Waste recycling: About 97% of all manufacturing waste is recycled annually
- Landfill disposal: In 2014 Diamond achieved zero waste to landfill status, becoming the first U.S.-based folding carton supplier to achieve the distinction
- Water Usage: absolute target of a 2% reduction in water usage per year for the next 10 years (20% total reduction), based on a 2022 baseline. We have also set an intensity target of a 3% reduction in water usage (cubic meters per unit of production) per year for the next 10 years (30% total reduction)
- Scope 1 and Scope 2 GHG emissions: 42% reduction by 2030 based on 2022 baseline
- Scope 1 and Scope 2 intensity target: 4.2% reduction per year based on 2022 baseline
- Scope 3 emissions: absolute target of a 2% reduction per year based on 2022 baseline

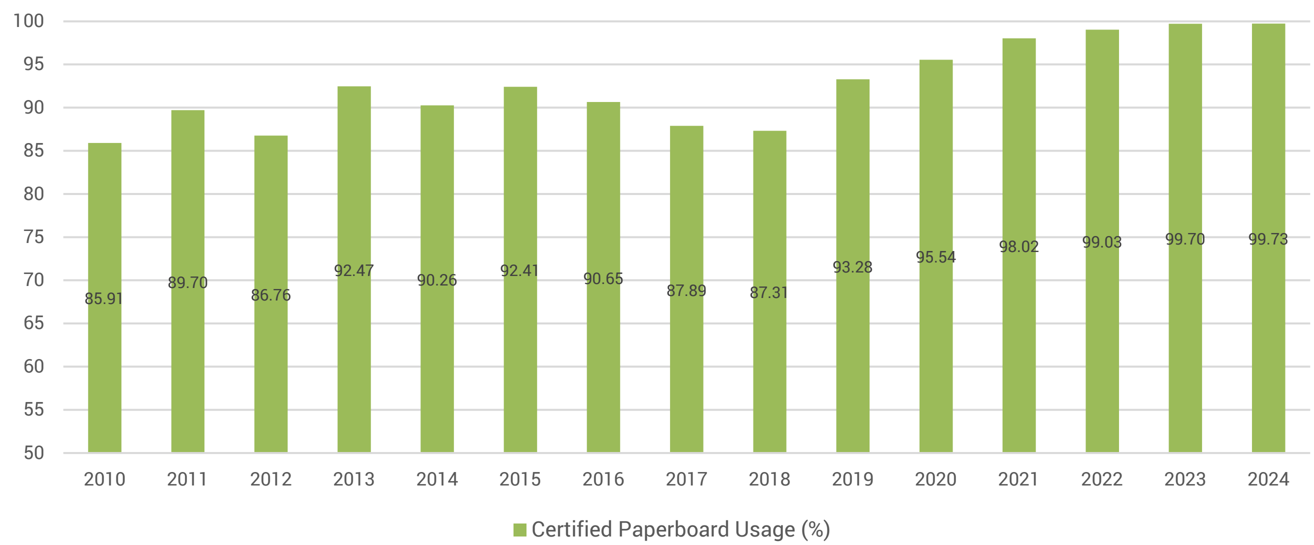
Process KPIs

- Policy training completion: Percentage (%) of Green Team members trained on carbon accounting | Target 100% in 2025

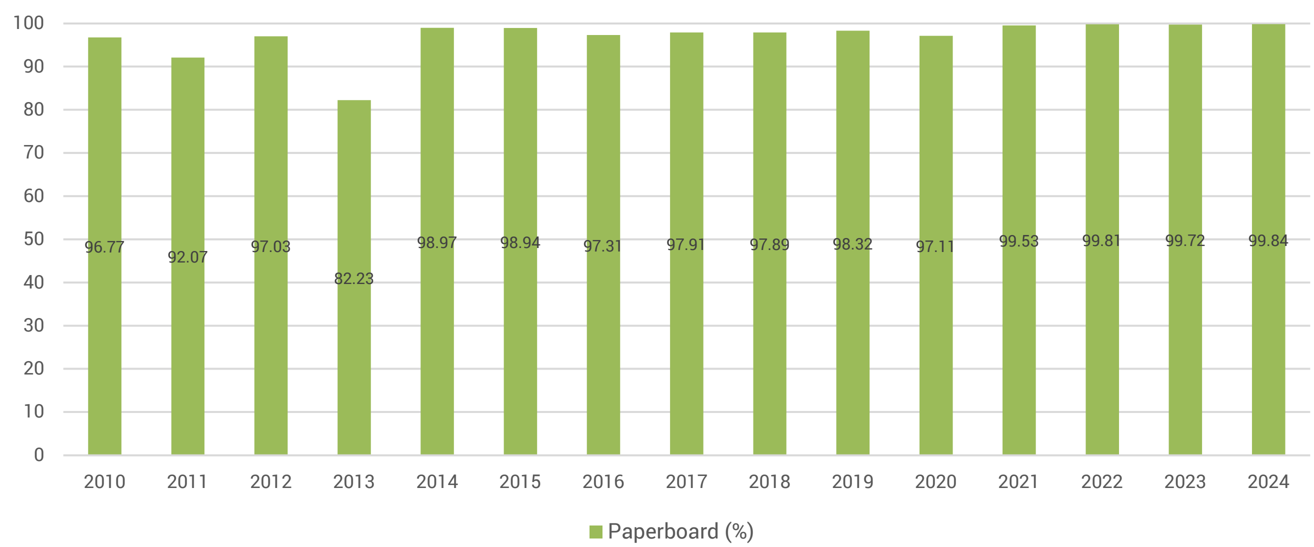
These KPIs are reported monthly (for critical metrics), quarterly (to Green Team), and annually (in Diamond Sustainability Report).

Environmental Stewardship Metrics

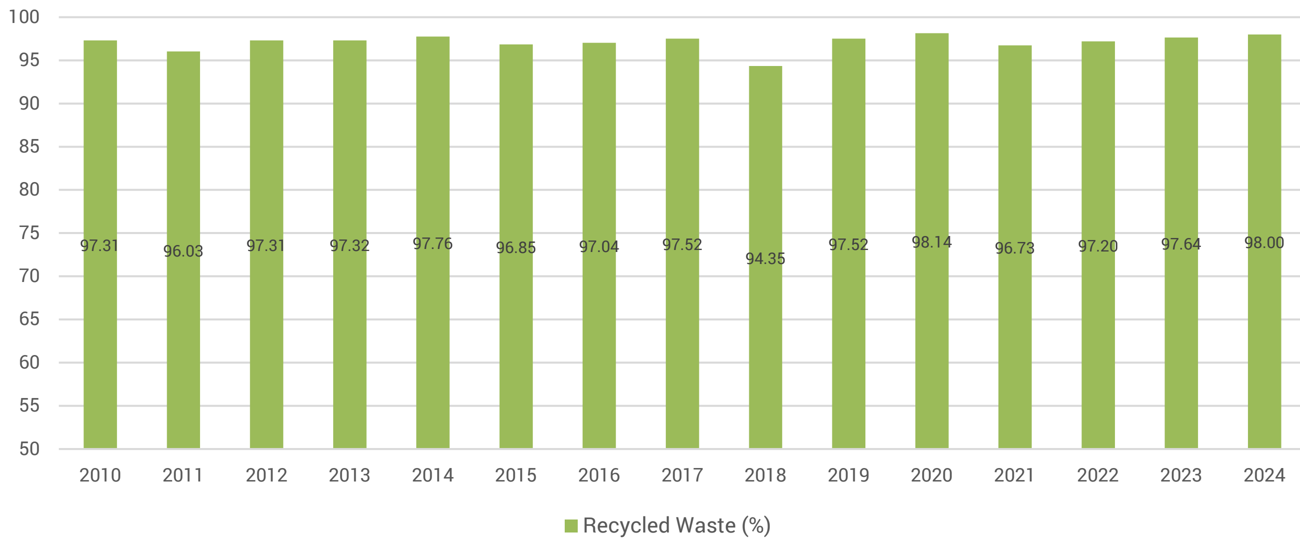
Certified Paperboard Usage



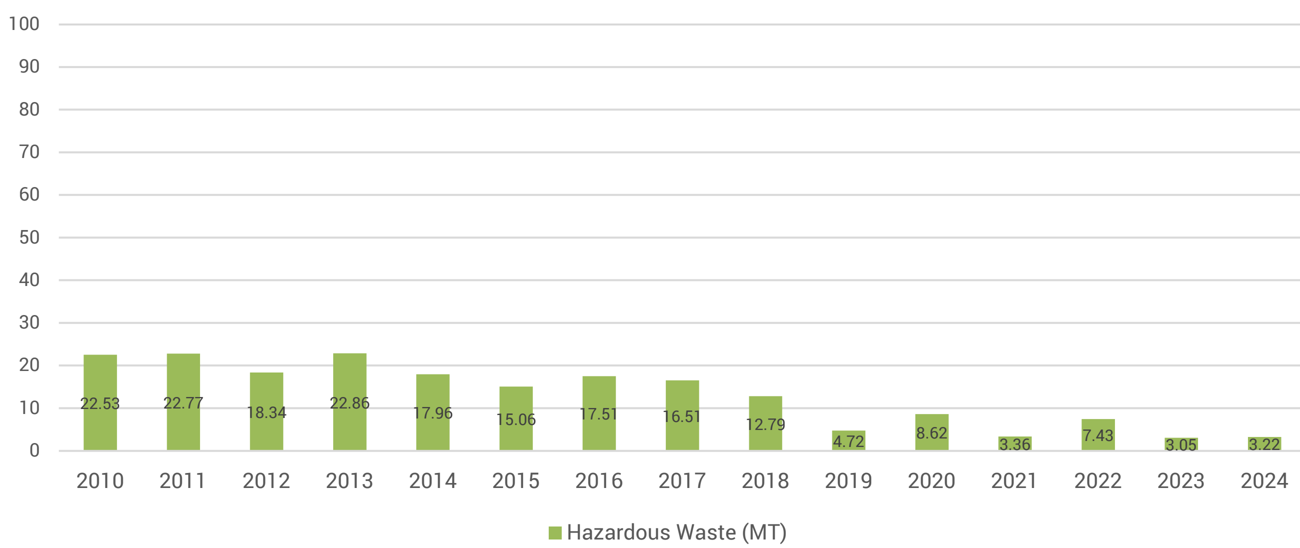
Recycled or Renewable Paperboard Usage



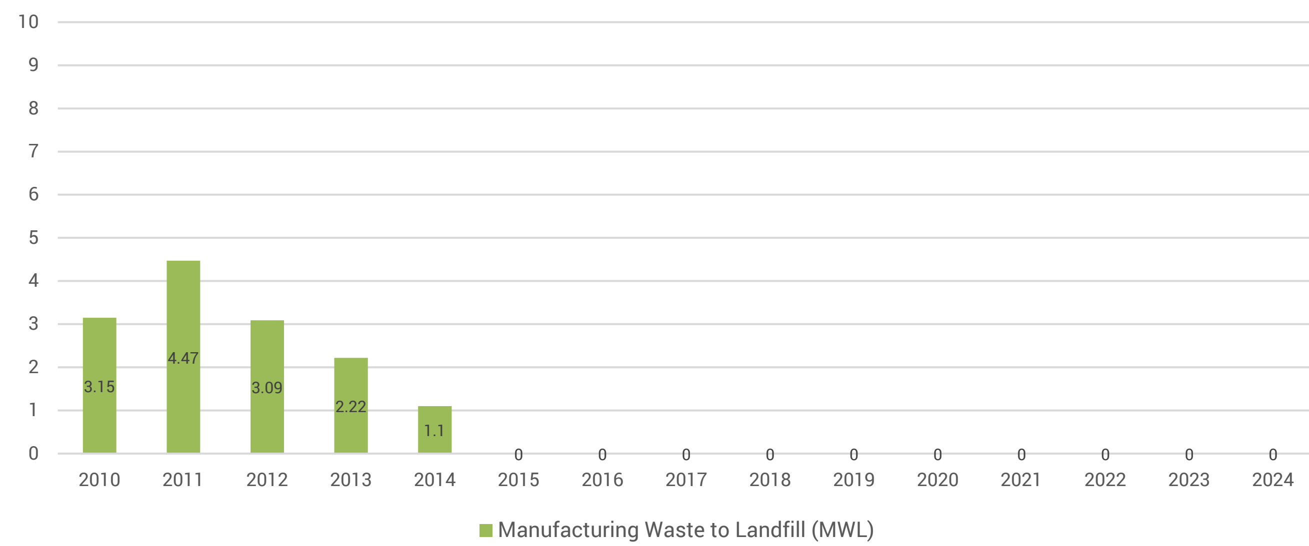
Recycled Waste



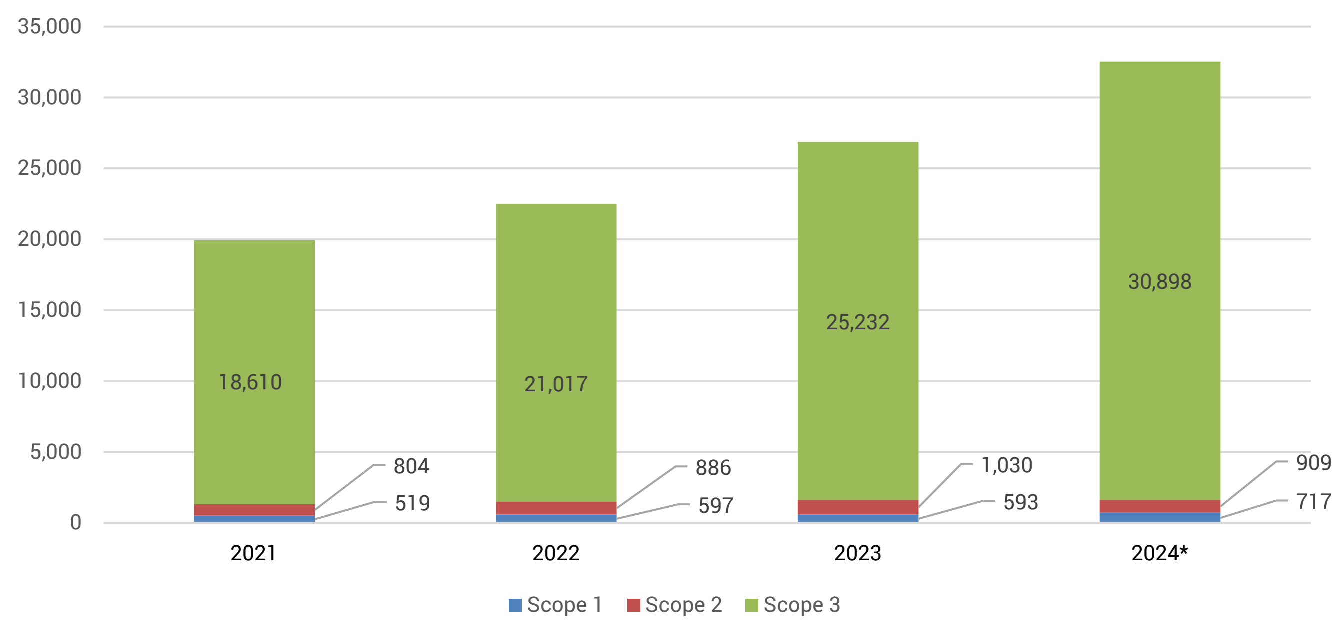
Hazardous Waste



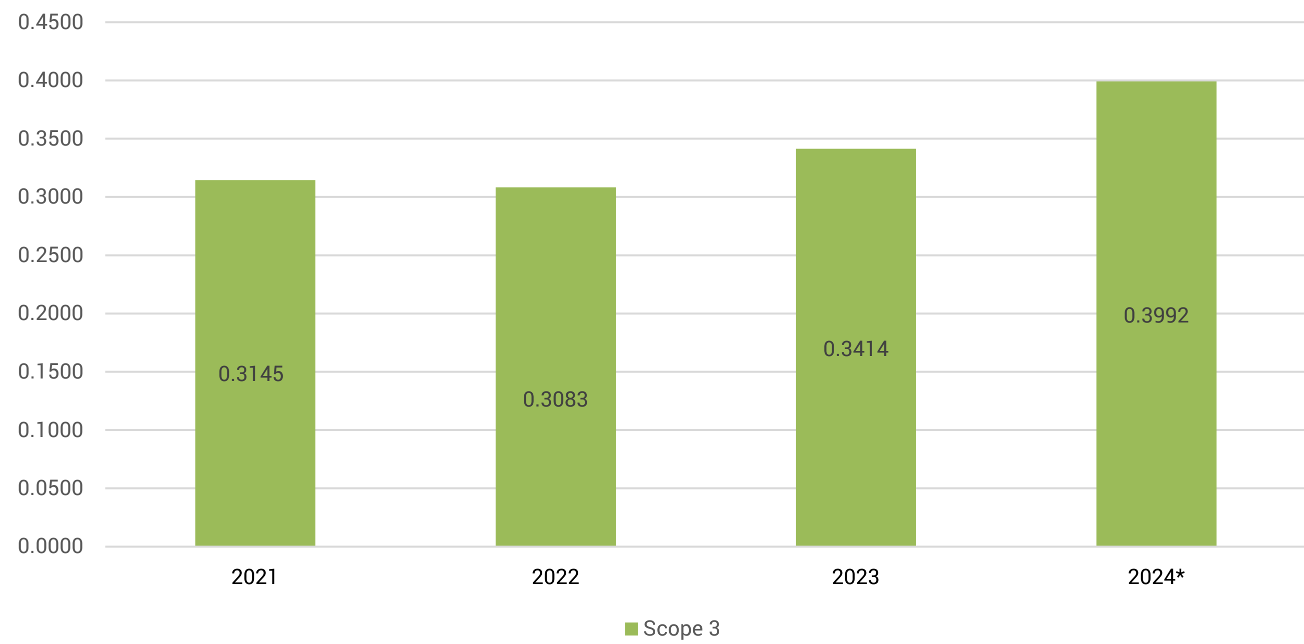
Manufacturing Waste to Landfill



Absolute Emissions (Scope 1 + Scope 2 + Scope 3)



Scope 3 Emissions Intensity



Governance Structure

The implementation and oversight of this Environmental Stewardship Policy is governed through the following structure:

Marketing Director / Sustainability Lead

- Overall accountability for emission calculations and performance
- Determines the basis for recalculation
- Reports sustainability metrics to executive leadership and Green Team quarterly
- Submit entity-wide and external GHG emissions inventory for verification
- Authors annual Sustainability Report for customers and external stakeholders, including CDP, EcoVadis, UN Global Compact

Operations/Facilities Director

- Overall accountability for overseeing execution of proper facility and equipment maintenance
- Identify facility inefficiencies and determine ways to optimize our performance
- Evaluate developments in process improvements to incorporate best practices at the plant level

Supply Management Team

- Identify opportunities to supply chain improvements
- Continued procurement of materials that are sourced through socially and environmentally suppliers

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

- Reviews progress against targets quarterly
- Recommend policy updates and new initiatives
- Ensuring 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 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 calculation methodologies
    - Changes in organizational boundaries
    - Changes in physical boundaries
    - Correction of errors

Documentation and Communication

- All policy updates will be documented with a date or version control
- Public-facing updates will be reflected in the annual Diamond Sustainability Report

Performance Monitoring

- Quarterly: Reports sustainability metrics to executive leadership and Green Team
- Annually: Track progress on sustainable sourcing
- Annually: Track emissions data and waste recycling metrics
- Annually: Evaluate overall environmental and social impact metrics and assess targets
- 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