

Fundamental Human Rights 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.

Fundamental Human Rights

At Diamond Packaging, we are committed to upholding and promoting the highest standards of human rights across all aspects of our operations. As a responsible corporate citizen in the Containers & Packaging industry, we recognize our duty to respect and support internationally recognized human rights principles as outlined by the United Nations Universal Declaration of Human Rights and the International Labour Organization's core conventions. This policy applies to all employees, contractors, suppliers, and business partners associated with Diamond Packaging.

We are dedicated to fostering a work environment that is free from discrimination, harassment, and any form of exploitation. Diamond Packaging strictly prohibits child labor, forced labor, and any practices that compromise the dignity and well-being of individuals. We ensure fair wages, reasonable working hours, and safe working conditions for all employees. Our commitment extends beyond compliance with local laws; we strive to exceed these standards by implementing best practices in human rights due diligence throughout our supply chain.

Furthermore, Diamond Packaging actively promotes diversity and inclusion within our workforce. We believe that a diverse team enriches our company culture and drives innovation. To this end, we provide equal opportunities for employment and advancement regardless of race, gender, age, disability, religion, sexual orientation or any other characteristic protected by law. We also encourage open dialogue and feedback from employees on human rights issues through accessible reporting mechanisms without fear of retaliation.

By integrating these principles into our business operations and corporate governance framework, Diamond Packaging aims to contribute positively to the communities we serve while ensuring that fundamental human rights are respected at every level of our organization.

As an employer in New York State, we are bound by New York State Labor Law which prevents employers from taking adverse employment action against employees who, off-the-job, legally use consumable products or engage in political, recreational, union, and certain other legal activities.



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

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:

Code of Conduct Violations

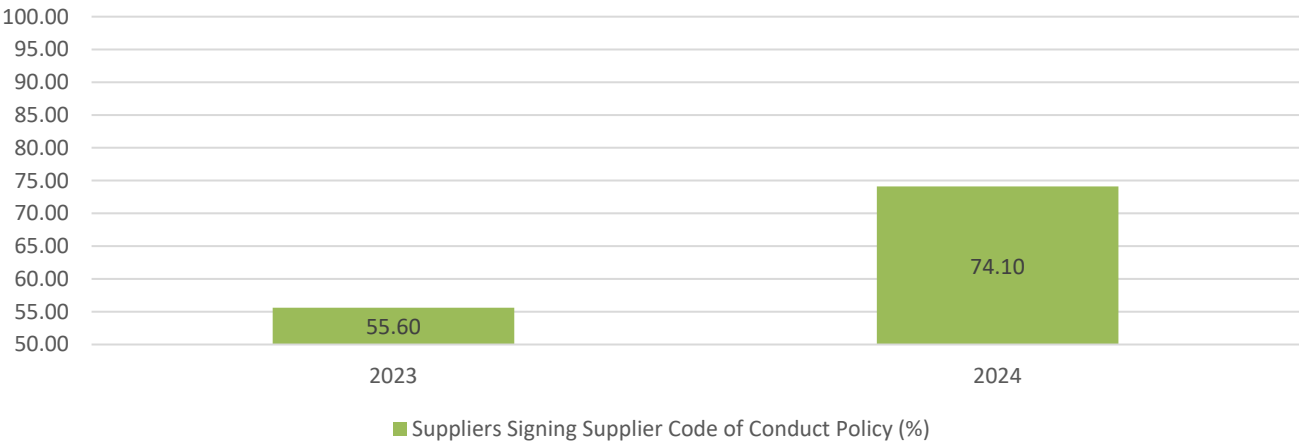
- 1. Business Ethics
 - a. Corruption
 - b. Conflict of interest
 - c. Fraud
 - d. Information Security
 - e. Anticompetitive practices
- 2. Child Labor
- 3. Forced Labor
- 4. Human Trafficking
- 5. Fundamental Human Rights

Code of Conduct Violations



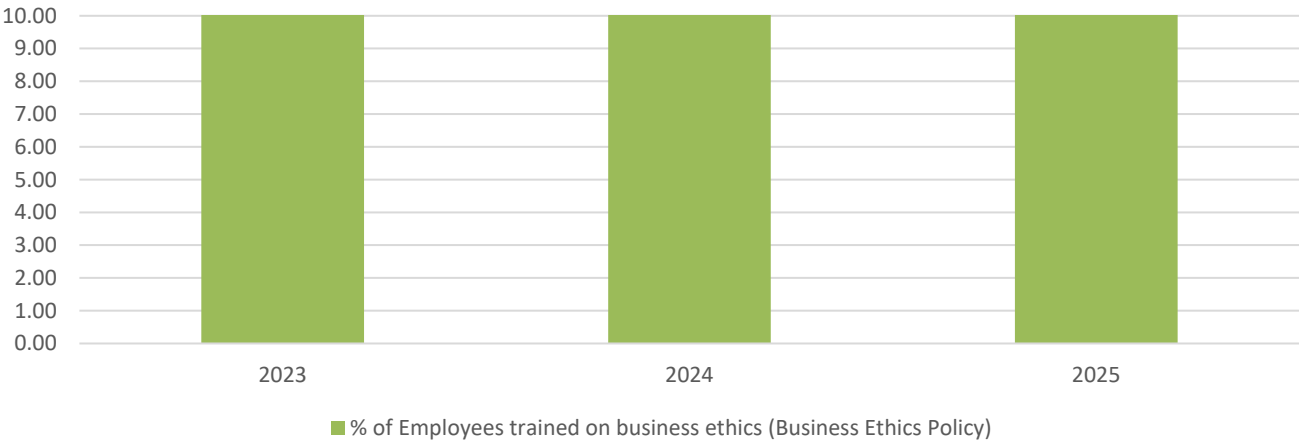
Diamond is committed to upholding the highest standards of business ethics and integrity. Our values and principles guide every decision we make, ensuring that we operate with transparency, fairness, and accountability. Code of Conduct violations extend to employees, interns, applicants, contractors, suppliers, consultants, and any other non-employees providing services in the workplace. See Diamond’s Employee Handbook for information on Governance, Review Mechanism, and Scope.

Suppliers Signing Supplier Code of Conduct Policy



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.

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](#).

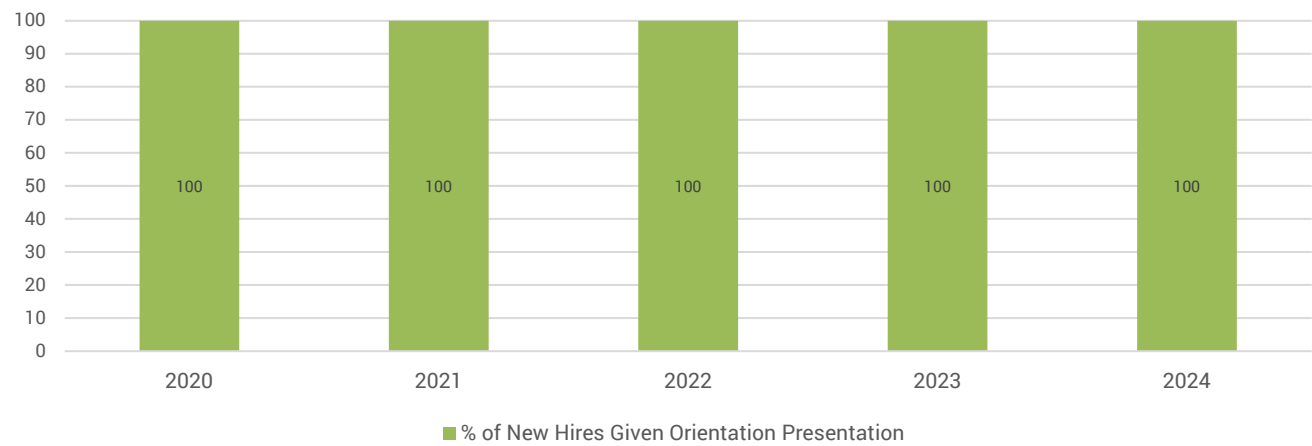
Employees Trained on Non-Harassment



Training is provided annually per New York State law by Bond, Schoeneck & King PLLC, Diamond's corporate law firm.

New Hires Given New Hire Orientation Presentation and New Hire Training, which include:

- 1. Human resources
- 2. Safety
- 3. Department
- 4. Information technology
- 5. Quality



All new hires must sign and acknowledge receipt of the Orientation and Training Checklist during the onboarding process.

Governance Structure

The implementation and oversight of this Fundamental Human Rights Policy is governed through the following structure:

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Reports training and compliance metrics to executive leadership
- Assists with Social Compliance audits as needed

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 human rights
 - 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 training rates
- 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