

Recycling Policy

Effective Date: January 2026
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Supply Chain Manager
Approved By: Chief Executive Officer (CEO)

Scope

This policy establishes Diamond Packaging's framework for managing, measuring, and continuously improving waste recycling and recovery across its operations. It applies to all manufacturing, office, and supply chain activities within the company's operational boundary.

Policy Statement

Diamond Packaging is committed to minimizing waste generation, maximizing material recovery, and maintaining zero waste to landfill through responsible recycling, recovery, and circular economy practices.

The company prioritizes waste reduction at the source, recycling of manufacturing byproducts, recovery of residual materials, and collaboration with strategic partners to continuously improve environmental performance.

Recycling Procedure

- Diamond's Green Team will review and document the need for any relevant interpretations or changes to our recycling programs and metrics.
- Any revisions must be clearly documented with explanations for the changes and their impacts.
- Any revisions to scope of recycling programs and key data will be approved by senior management before publication.
- The updated recycling initiatives and related documentation will be maintained for audit and verification purposes.

Communication

Any changes will be transparently communicated in the company's GHG emissions and sustainability reports, including the scope of our programs and the reported environmental impact of these initiatives.

Implementation Measures

To achieve our recycling and recovery objectives, Diamond has established the following concrete measures:

Recycling and Recovery Measures

Manufacturing Waste

- 97% of manufacturing waste is recycled annually (based on most recent reporting year).
- Diamond has maintained zero manufacturing waste to landfill status since 2014.

Zero Waste to Landfill

- In 2014, Diamond achieved Zero Waste to Landfill (ZWL) status, becoming the first U.S.-based folding carton manufacturer to achieve this distinction. Since that time, Diamond has maintained its commitment to landfill diversion across its operations.

Circular Economy

- Diamond is the start and end point for its own waste stream. Through strategic partnerships, part of the paper waste stream that leaves the Diamond facility eventually returns in the form of raw materials (e.g., corrugated boxes, tissue).

Strategic Partnerships

- Diamond has strategic partnerships with Cascades Recovery and Reworld, among others, to advance its recovery and recycling goals.

Sustainable Methods

- From concept to completion, our approach to packaging design addresses sustainability throughout the supply chain to incorporate best practices at the plant level: renewable energy, energy efficiency, process improvements, and waste recycling.

Continuous Improvement Measures

Data Collection and Analysis

- Gather and calculate data to assess progress and determine future goals
- Collaborate with strategic partners to improve material renewability, recyclability, and recovery performance
- Establish baseline metrics for all key performance indicators by Q4 2026

Stakeholder Engagement

- Solicit feedback from customers on sustainability 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

Innovation and Technology

- Collaborate with industry providers on emerging technologies specializing in sustainability and waste recycling and recovery
- Invest in more efficient equipment and facility upgrades to complement existing methods

Key Performance Indicators (KPIs)

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

Environmental KPIs

- Recycling:
 - % renewable or recycled paperboard usage
 - % manufacturing waste recycled
 - % manufacturing waste to landfill
 - % hazardous waste reduction (2018 baseline)
- Total waste generated per production unit (e.g., MT per million cartons) | Target: year-over-year reduction
- This policy supports disclosures under GRI 306 (Waste)

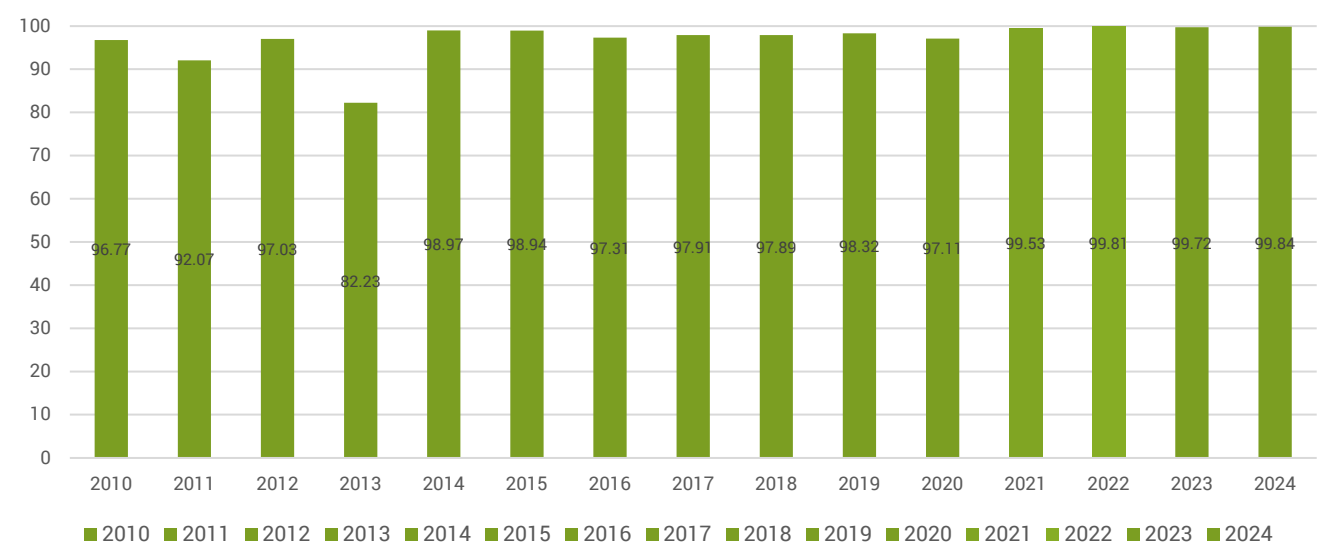
Process KPIs

- Policy training completion: Percentage (%) of Green Team members trained on waste recycling and recovery | Target 100%

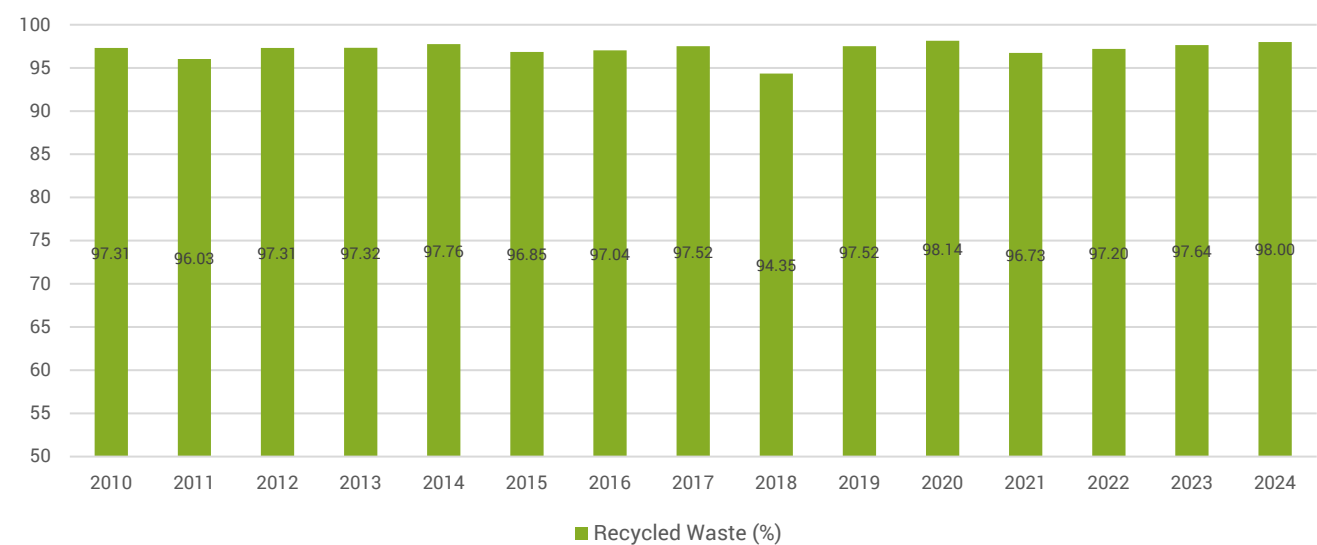
These KPIs are reported monthly (for critical metrics), quarterly (to Green Team), and annually (in Diamond Sustainability Report).

Metrics

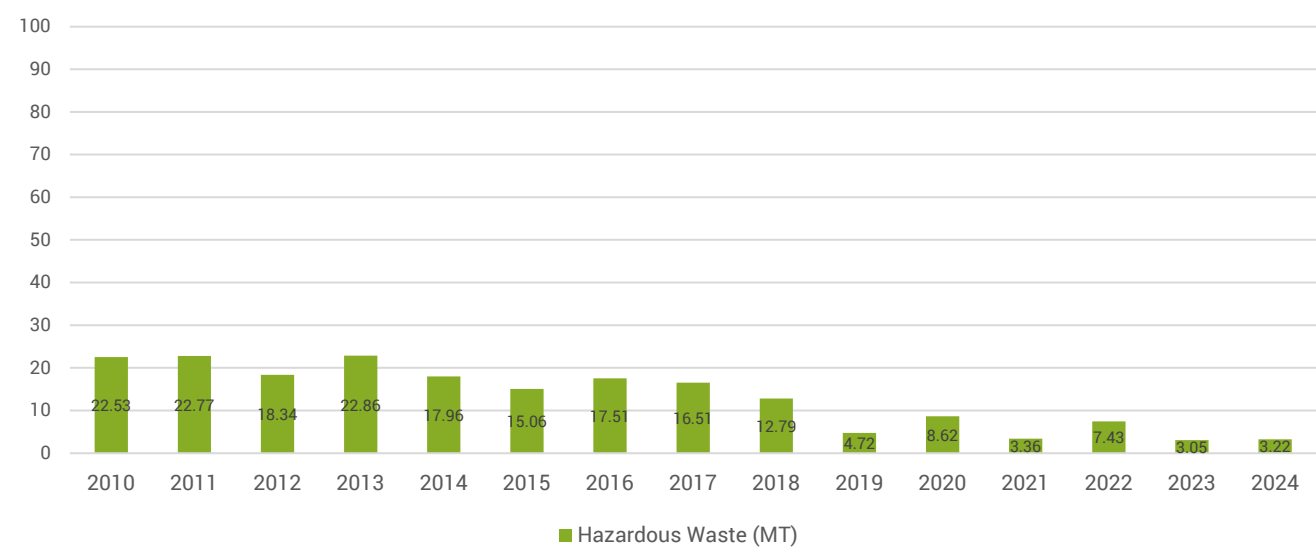
Renewable or Recycled Paperboards Usage



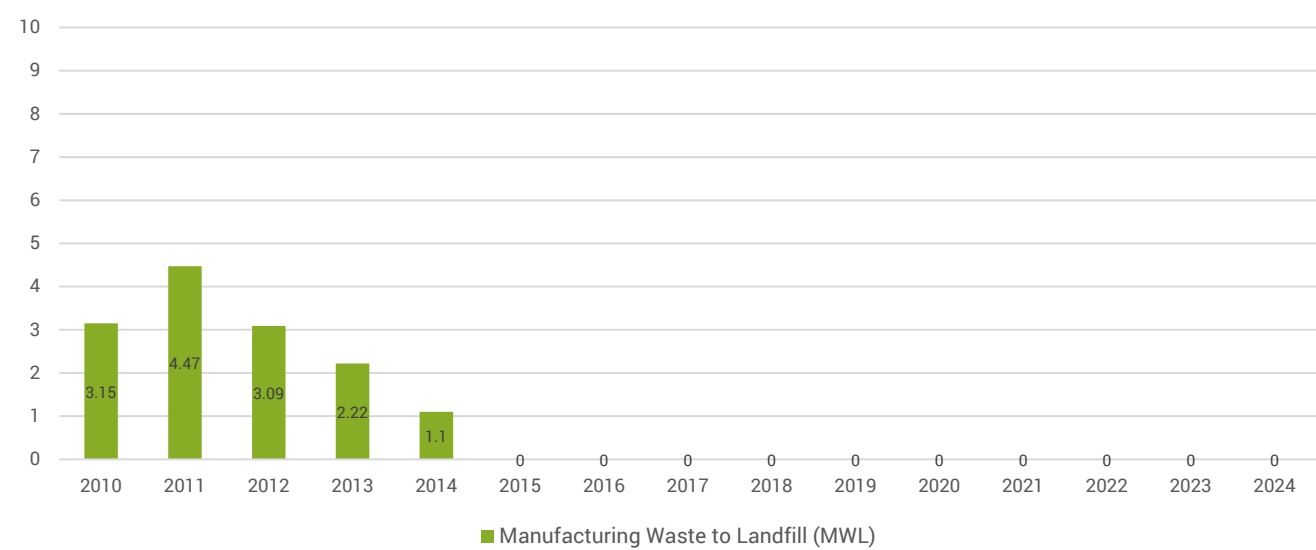
Recycled Waste



Recycled Hazardous Waste (metric tons)



Manufacturing Waste to Landfill (metric tons)



Governance Structure

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

Supply Chain Management Team

- Engage with strategic partners to foster a transparent transfer of expertise and data to mitigate environmental impacts
- Identifies opportunities for supply chain improvements

Marketing Director / Sustainability Lead

- Overall accountability for calculations and performance
- Determines the basis for recalculation
- 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
- 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 recycling metrics to executive leadership and Green Team
- Annually: Track data based on a holistic approach to achieve greater accuracy
- Annually: Evaluate overall environmental and social impact metrics and assess targets
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- May engage third-party audits to verify compliance with recycling and recovery criteria
- Participate in industry benchmarking to identify improvement opportunities
- Maintain transparency through public reporting of key metrics