

Social Dialogue Policy

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

Scope

This Social Dialogue Policy applies to all Diamond Packaging employees, including temporary workers, contractors, and consultants.

Social Dialogue

Diamond Packaging is committed to maintaining structured and meaningful dialogue between employees and management. The company provides multiple formal channels through which employees can communicate concerns, offer suggestions, participate in workplace discussions, and receive feedback from management.

The company's commitment to its employees through open dialogue, respectful working environment, and a generous benefits package, leads to a stronger, richer, and more rewarding work environment.

Two-Way Communication

At Diamond, our success and innovation in the packaging industry stem directly from our talented, dedicated workforce. We foster a workplace built on mutual respect, comprehensive benefits, and two-way communication, maintained through an Open Door Policy, regular company and department meetings, monthly roundtable discussions with the company President, and anonymous suggestion boxes throughout the three facilities. While operating in full compliance with New York State (NYS) and federal labor laws, our commitment to open dialogue, employee wellbeing and professional growth has created a rich, rewarding environment where team members thrive.

Employee Representation

Employees are encouraged to actively participate in workplace discussions through department meetings, company meetings, direct consultation with supervisors and HR, anonymous suggestion boxes, and cross-functional committees (e.g., Safety Committee, Green Team, Continuous Improvement teams). Employees may raise concerns, recommend improvements, and participate in discussions affecting workplace practices without fear of retaliation.



Freedom of Association and Collective Bargaining

Diamond respects employees' rights to freedom of association and collective bargaining in accordance with applicable federal and state labor laws. Employees are free to establish or join organizations of their choosing, without interference or retaliation.

Diamond operates as a non-union facility and values the skill and dedication of its team members. The company complies with all applicable New York State and Federal labor-relations and freedom-of-association requirements. Historically, union-organizing efforts have occurred, but employees have chosen not to unionize, citing wages and benefits that meet or exceed those proposed by organizers.

Labor Practices and Human Rights Measures

Employee Handbook

- 100% of employees must sign and acknowledge receipt of the Employee Handbook during the hiring process

Employee Communication

- 100% of employees are trained on the company's Open Door Policy
- 100% of employees attend company meetings
- 100% of employees attend department meetings
- 100% of employee concerns are resolved within 30 days
- 100% of employees have access to anonymous suggestion boxes

Audit and Verification Program

- Utilize third-party audits (e.g., EcoVadis, FSC) for independent verification of labor practices
- Maintain compliance reporting through formalized KPIs

Continuous Improvement Measures

To promote open communication, employee engagement, and continuous improvement, the Company is committed to maintaining regular opportunities for dialogue between employees and management.

New Hire 30-Day Check-Ins

All new employees participate in a 30-day check-in with their supervisor and/or Human Resources representative. The purpose of this meeting is to:

- Review the employee's onboarding experience.
- Discuss any questions, concerns, or training needs.
- Provide feedback and support to ensure a successful transition into the organization.
- Encourage open and constructive two-way communication.

Formal 90-Day Review

Employees participate in a formal 90-day review following their start date. This review serves as a structured opportunity for both the employee and management to:

- Discuss job performance, expectations, and accomplishments.
- Identify areas for development and additional support.
- Provide mutual feedback regarding the employee's experience and integration into the organization.
- Establish goals and expectations for continued success.

Ongoing Feedback and Engagement

The Company encourages continuous dialogue beyond these milestones through regular supervisor meetings, team discussions, employee surveys, and other communication channels. Feedback received through these processes will be reviewed and considered as part of the Company's commitment to continuous improvement, employee engagement, and a positive workplace culture.

This approach helps ensure that employee voices are heard, concerns are addressed promptly, and opportunities for organizational improvement are identified and acted upon.

Data Collection and Analysis

- Maintain all records related to Open Door Policy reporting and resolution(s)
- Maintain compliance reporting through formalized KPIs
- Track average resolution time for reported issues to identify process delays
- Analyze trends in issue types and frequencies to identify systemic workplace concerns
- Conduct quarterly reviews of anonymous feedback data to measure employee trust in the process

Stakeholder Engagement

- Solicit feedback from employees on expectations relating to the policy
- Engage with industry associations to stay current on best practices
- Hold focus groups with diverse employee representatives to gather qualitative insights on policy effectiveness

Innovation and Technology

- Develop an internal dashboard for HR to track and manage open cases, ensuring timely follow-up and resolution

Key Performance Indicators (KPIs)

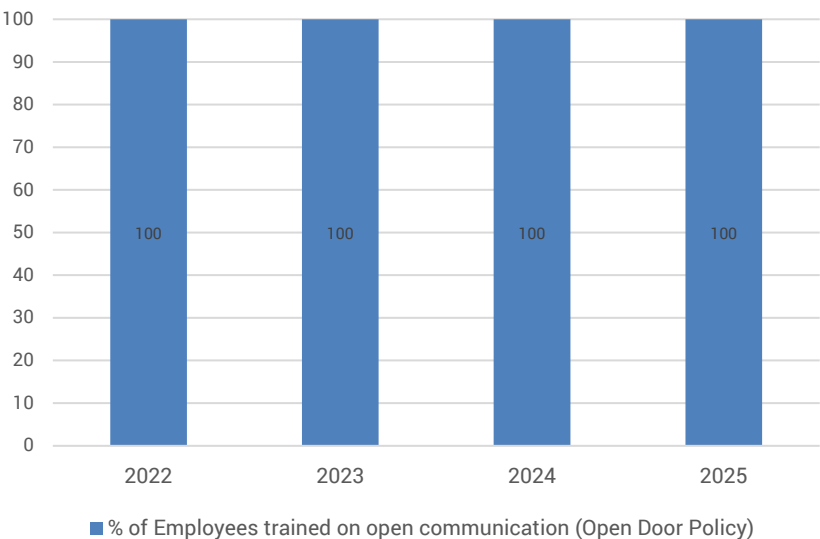
To monitor progress on implementation measures, Diamond tracks the following KPIs:

Social Dialogue Process KPIs

- Percentage of employees trained on the company’s Open Door Policy | Target 100%
- Percentage of employees attending company meetings | Target 100%
- Percentage of employees attending department meetings | Target 100%
- Percentage of employee concerns resolved within 30 days | Target 100%
- Percentage of employees that have access to anonymous suggestion boxes | Target 100%

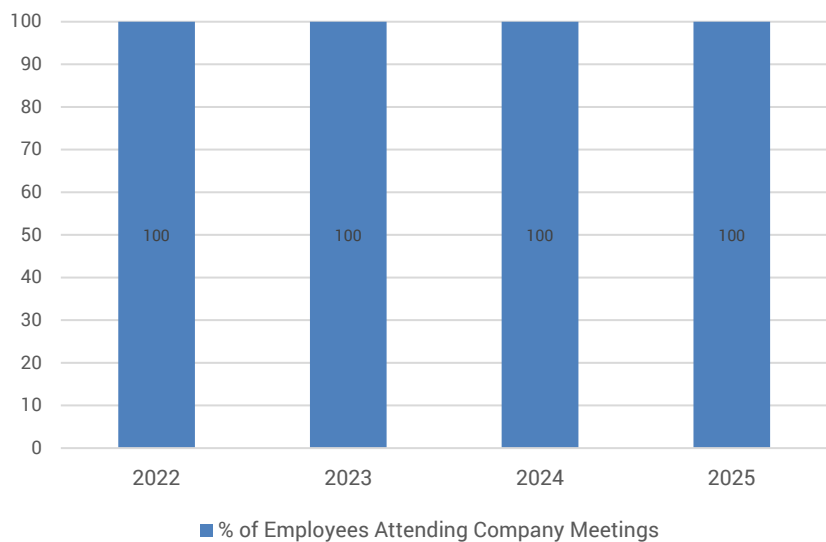
These KPIs are reported monthly (for critical metrics), quarterly (to Green Team), and annually (in Diamond’s Sustainability Report).

Employees Trained on Open Communication (Open Door Policy)



Diamond's objective is to provide a work environment free from elements that would deter employees from doing their best work. The company maintains this policy so that employees feel comfortable raising and discussing any workplace issues they may have. Diamond’s Open Door Policy is found in the Employee Handbook. This policy is signed off on by all employees. Diamond's Open Door Policy is also publicly available in its GRI-aligned Sustainability Report and on the ESG Policies web page of its [website](#).

Employees Attending Company Meetings

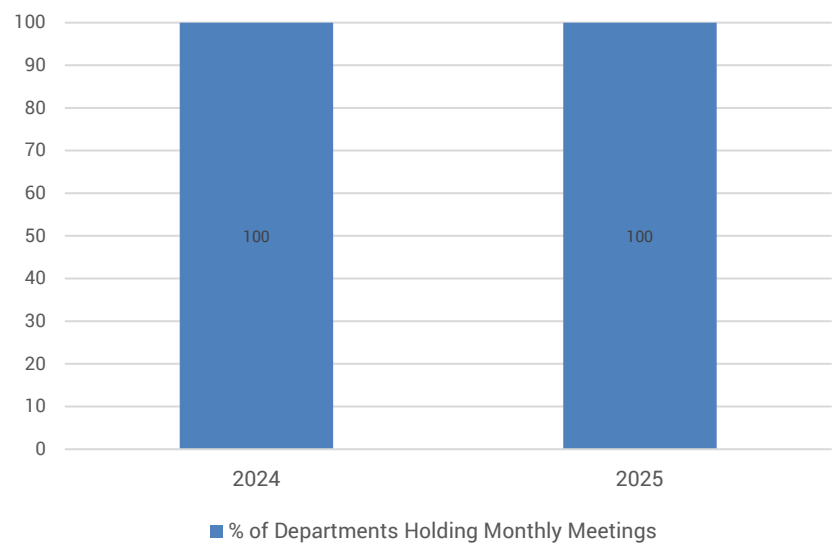


Diamond holds semi-annual all-company meetings, scheduled to ensure employees across all three shifts can attend.

These meetings give management a direct channel to communicate company performance and priorities to the entire workforce. Standing topics include Gain Sharing results, Sales and Marketing updates, Quality performance, Manufacturing operations, Safety metrics and initiatives, Finance and business performance, and Human Resources updates. Time is also set aside for general questions and other topics as needed, such as community service drives, recycling initiatives, and other company or community programs.

This structure reinforces transparency and gives all employees, regardless of shift, equal access to company-wide information and a direct opportunity to raise questions or concerns with leadership.

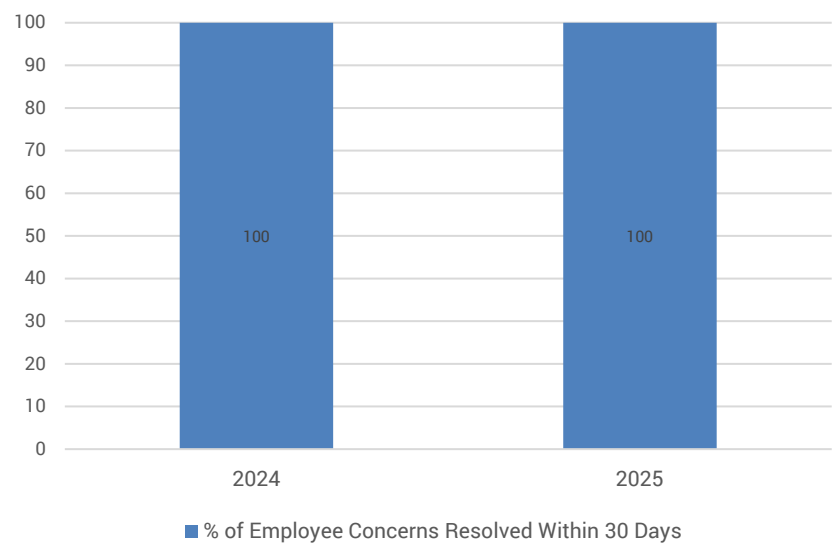
Departments Holding Monthly Meetings



Each department also holds monthly meetings with employees to discuss operational updates, address concerns, and gather feedback.

These meetings are mandatory for all employees and serve as a key channel for open communication between management and staff. Topics may include workplace safety, production goals, policy changes, and any issues raised by team members. Employees are encouraged to speak openly, and department leaders are responsible for documenting key discussion points and following up on action items in a timely manner.

Percentage of Employee Concerns Resolved Within 30 Days



Diamond is committed to responding promptly and effectively to employee concerns raised through its Open Door Policy, company meetings, department meetings, Human Resources, anonymous suggestion boxes, or other established communication channels.

Diamond measures the percentage of documented employee concerns that are investigated, addressed, and resolved within 30 calendar days. Monitoring this metric helps evaluate the effectiveness of Diamond's social dialogue process, promotes timely communication and accountability, and supports continuous improvement of workplace practices.

Employees may raise concerns, ask questions, provide suggestions, or participate in workplace discussions without fear of retaliation.

Governance Structure

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

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Overall accountability for Social Dialogue Policy
- Reports KPI progress to executive leadership
- Assists with Social Compliance audits as needed

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

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
 - Performance data from the previous year

Trigger-Based Reviews

- Policy may be reviewed outside the annual cycle when:
 - New legislature related to social dialogue has been created
 - There is a change to the status of social dialogue in the company

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

- Monthly: Evaluate participation in employee communication and consultation mechanisms
- Monthly: Review employee feedback trends and issue resolution performance
- Assess effectiveness of communication channels
- Report findings to executive leadership team

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