

Supplier Responsibility Policy

Effective Date: January 2024
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Director of Marketing
Approved By: Chief Operating Officer (COO)

Scope

This policy applies to all consultants, contractors and any other third parties, which include customers and vendors.

Supplier Responsibility

Diamond Packaging is committed to building long-term relationships with our business partners based upon mutual respect and socially responsible practices.

We actively seek out business partners who share, and are committed to, our values. Additionally, we take great pride in our talented and dedicated team members, all of whom help make Diamond one of the most successful and innovative companies in the packaging industry.

Our continued success rests on our team members, and we strive to ensure a workplace in which all of them are afforded the dignity and respect that they have earned.

In order to meet that goal, we are committed to the following practices:

- We ensure compliance with all applicable labor laws;
- We strive to ensure that all forms of discrimination are avoided;
- We ensure employees' freedom to associate is respected;
- We ensure safe working conditions for our employees;
- We ensure that all employees are at least 18 years old;
- We ensure that there is no forced labor of any kind.

We expect our business partners to implement these same practices in order to ensure safe, healthy, and productive workplaces. Diamond takes its social and ethical responsibilities seriously, and we expect that everyone who contributes to our success also continues to strive for healthy work environments.

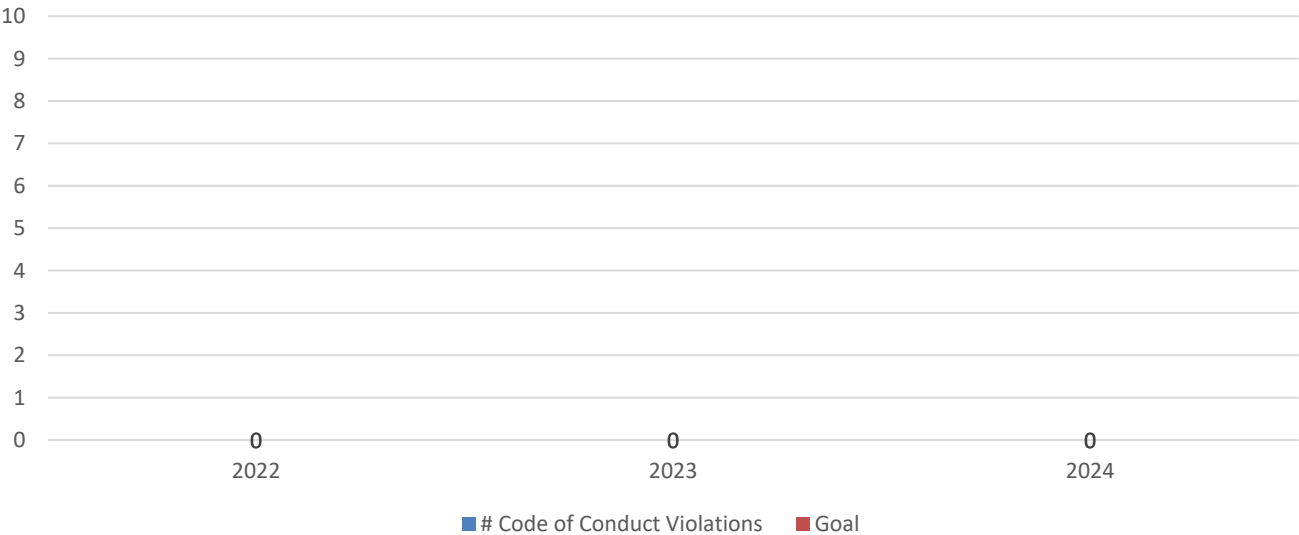


Key Performance Indicators (KPIs)

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

Code of Conduct Violations, including:

- Business Ethics
- Corruption
- Conflict of interest
- Fraud
- Information Security
- Anticompetitive practices
- Child Labor
- Forced Labor
- Human Trafficking
- Fundamental Human Rights



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. Diamond’s **Code of Conduct Policy** is found in the Employee Handbook. This policy is signed off on by all employees.

See Diamond’s **Employee Handbook** for information on Governance, Review Mechanism, and Scope.

Suppliers Signing Supplier Code of Conduct Policy, addressing:

- 1. All applicable laws, regulations
- 2. All environmental laws
- 3. Safe and healthy work environment
- 4. Labor practices
- 5. Forced labor, child labor
- 6. Discrimination
- 7. Ethics
- 8. Compliance



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. All responses are tracked in Diamond’s SharePoint database with the following status – Complete, Complete (no exception), Pending, N/A – and date completed.

Governance Structure

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

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)

Marketing Director / Sustainability Lead

- Overall accountability for supplier agreement standards
- Works with Procurement Team to increase supplier compliance
- Reports violations to executive leadership
- Overall accountability for ESG reporting
- 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 target
- Updates will be incorporated based on:
 - Regulatory changes relating to supplier responsibilities
 - 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 Number of Code of Conduct violations
- Annually: Evaluate Code of Conduct compliance
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- Participate in industry benchmarking to identify improvement opportunities