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Wind Energy Policy

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

Scope

This Wind Energy Policy applies to all owned and operated facilities under Diamond Packaging's operational control, in accordance with the GHG Protocol Corporate Standard.

Wind Energy

Diamond Packaging integrates renewable electricity procurement into its climate governance framework to reduce Scope 2 emissions and support grid decarbonization. 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. This purchase fully covers the electricity needs for all three facilities (box plant, finishing plant, and warehouse).

Renewable Energy Certificates (RECs) are applied under the market-based accounting method in accordance with the GHG Protocol Scope 2 Guidance. Diamond separately reports its location-based Scope 2 emissions in its annual GHG inventory.

Implementation Measures

To achieve our wind energy objectives, Diamond has established the following concrete measures:

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.
- Diamond purchases and retires a volume of RECs equivalent to its annual electricity use (approximately 8,400 MWh, subject to annual adjustment).
- Diamond prioritizes Green-e certified RECs sourced from new-build wind projects within the United States to support additional renewable energy capacity and strengthen domestic grid decarbonization.

EPA Green Power Leadership Club

- Diamond has been awarded membership to the Environmental Protection Agency's (EPA's) Green Power Leadership Club

Green-e Certified

- All RECs are Green-e certified and permanently retired on behalf of Diamond Packaging to prevent double counting.

Strategic Partnerships

- Collaborations with key partners on energy conservation, including Constellation Energy, NuEnergen for Demand Response Program enrollment, and Rochester Gas & Electric (RG&E) for sustainable energy audits and our Energy Management Plan (EMP)

Verified Carbon Footprint

- Diamond's entity-wide greenhouse gas (GHG) emissions are verified by SCS Global Services
- A third-party verified carbon footprint ensures that our greenhouse gas measurements are accurate and reliable, and provides transparency and credibility with stakeholders.

Environmental Sustainability Measures

Energy Efficiency

- Energy conservation, avoidance, and efficiency initiatives are a core part of our operational sustainability strategy.
- Through the implementation of energy-efficient technologies, process improvements, equipment modernization, and other projects, we proactively work to reduce overall energy consumption and stay on pace with established emissions targets.
- Renewable energy procurement does not replace the company's commitment to reduce absolute energy consumption and direct emissions.
- Renewable energy procurement supports Diamond's science-based emissions reduction pathway but does not substitute for absolute emissions reductions.

Continuous Improvement Measures

Data Collection and Analysis

- Collect and calculate energy consumption across all relevant facilities and operations
- Assess results to inform future purchases of wind energy

Stakeholder Engagement

- Solicit feedback from customers, suppliers, and energy partners on sustainability expectations
- Engage with industry associations to stay current on best practices
- Provide greater transparency and credibility through third-party verification registries
- Participate in collaborative initiatives for exemplary environmental leadership

Innovation and Technology

- Evaluate emerging technologies that support facility efficiency improvement goals
- Implement additional production optimizations, energy efficiency measures

Key Performance Indicators (KPIs)

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

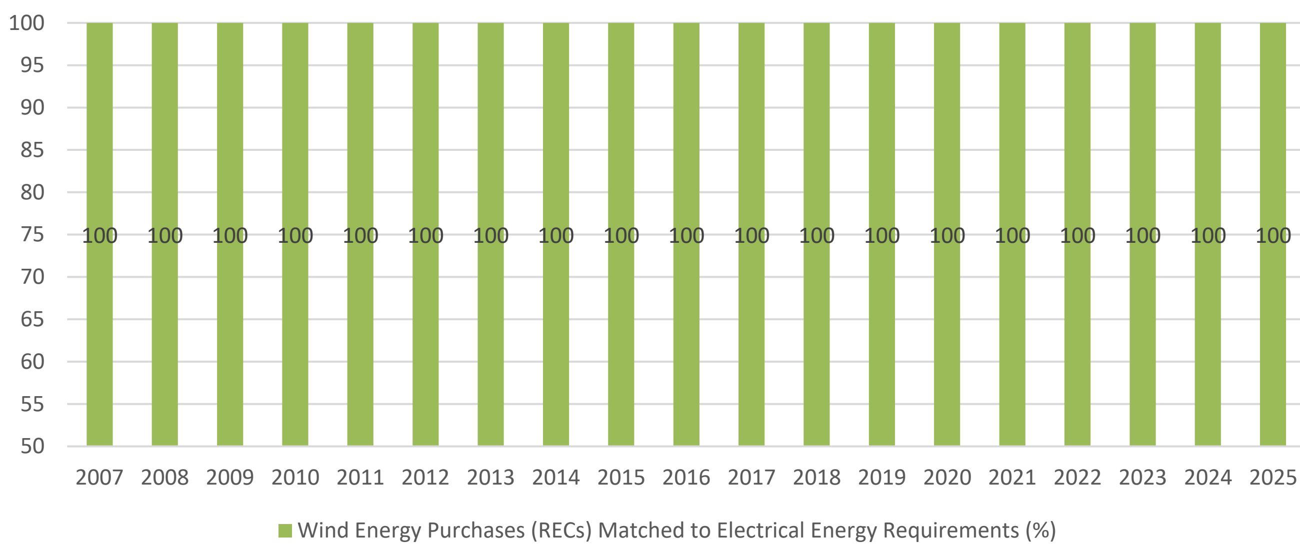
Environmental KPIs

- Wind energy (RECs): Diamond purchases and retires Green-e certified wind-generated renewable energy certificates (RECs) to match 100% of its electrical energy consumption
- Electricity usage: Electricity consumption matched 100% with retired Green-e certified RECs (volume adjusted annually)

Process KPIs

- Policy training completion: Percentage (%) of relevant personnel involved in energy procurement, emissions accounting, and sustainability reporting trained on renewable energy and Scope 2 accounting requirements | Target 100%

Wind Energy Purchases (RECs) Matched to Electrical Energy Requirements



Green Team Members Trained on Wind Energy

Governance Structure

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

Marketing Director / Sustainability Lead

- Overall accountability for energy usage reporting, emission calculations, and REC purchases
- 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

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, partners, 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
- Updated policies will be communicated to all suppliers within 30 days
- 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 energy data, emissions calculations, and REC requirements
- 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