



# SUPPLIER CODE OF CONDUCT

**Approved by:** Atlantic Packaging Senior Management Team

**Authorizer:** Director of Procurement

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**Last Revised Date:** Dec. 2023

## 1. Introduction

Corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain are of paramount importance to Atlantic Packaging Products Ltd and its affiliated companies ("**Atlantic**"). These principles apply to all aspects of Atlantic's business and encompass all manufacturers, distributors, vendors, contractors, and other suppliers (each a "**Supplier**" and collectively "**Suppliers**") that supply the products and services to Atlantic.

Our ethical culture is established and applied in procurement activities in order to protect accountability, integrity, fairness, and transparency across our supply chains. We expect our supply partners to respect and commit themselves to Atlantic ethical values and policies when conducting business with us.

Atlantic suppliers shall operate in accordance with the highest standards of integrity, including honesty, truthfulness, and fairness. They must maintain an objective and independent attitude, avoid conflicts of interest, and engage only in fair trade.

These principles are reflected in this Code of Conduct ("**Code of Conduct**"), which establishes the minimum standards that must be met by any Supplier that sells goods or services to or does business with Atlantic regarding:

- Labour
- Human Rights
- Environmental Protection
- Ethical Conduct

Atlantic expects its direct Suppliers to share this Code with their subcontractors and requires at least the same standards of conduct from their subcontractors.

## 2. Applicability

This Code of Conduct applies to all suppliers providing goods to Atlantic. Supplier is responsible for compliance with the standards set out in this Code of Conduct ("**Standards**") throughout its operations and supply chain.

Without limiting the Supplier's obligations hereunder, the Supplier shall comply with the Standards in all its Facilities; and all its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labour, immigration, health, worker safety, and the environment.

Without limiting the Supplier's obligations hereunder, the Supplier is responsible for compliance with the Standards by all its suppliers, vendors, agents, and subcontractors and their respective Facilities ("**Partner(s)**").

### **3. Labour**

#### 3.1. Slavery and Human Trafficking

All labour must be voluntary. Supplier shall not support or engage in slavery or human trafficking in any part of its supply chain.

Without limiting the Supplier's obligations hereunder, the Supplier shall not and shall ensure that its Partners do not support or engage in, or require any:

- compelled, involuntary, or forced labour;
- labour to be performed by children/individuals under the age of 15 in the absence of local legislation on minimum working age
- bonded labour;
- indentured labour; and
- prison labour.

#### 3.2. Compliance and Documentation

Supplier shall implement and maintain a reliable system to verify the eligibility of all workers, including age eligibility and legal status of foreign workers.

#### 3.3. Hazardous Work

Without limiting the Supplier's obligations hereunder, the Supplier shall not and shall ensure that its Partners do not support or engage in or require any hazardous labour to be performed by any person under the age of 18. Hazardous labour involves any work that, by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the safety or health of the worker or coworkers if adequate protections are not taken.

#### 3.4. Freedom to Terminate Employment

Without limiting the Supplier's obligations hereunder, the Supplier shall allow workers to terminate their employment or work arrangement:

- without restriction; and
- without the threat or imposition of any discipline, penalty, retaliation, fine, or other monetary obligation.

## 4. Human Rights

### 4.1. No Discrimination, Abuse, or Harassment

Supplier shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, colour, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Supplier shall treat workers with respect and dignity.

Supplier shall not subject workers to corporal punishment or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behaviour by its Partners.

### 4.2. Health and Safety

Supplier shall provide a safe, healthy, and sanitary working environment. Supplier shall implement procedures and safeguards to prevent workplace hazards and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards and work-related accidents and injuries that are not specifically addressed in these Standards.

General and industry-specific procedures and safeguards include those relating to:

- health and safety inspections;
- equipment maintenance;
- maintenance of Facilities;
- worker training covering the hazards typically encountered in their scope of work;
- fire prevention; and
- documentation and record-keeping.

Supplier shall provide workers with adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

### 4.3. Facilities

- Supplier shall ensure that all facilities meet all applicable building codes and industrial design and construction standards;
- obtain and maintain all construction approvals required by law;
- obtain and maintain all zoning and use permits required by law;
- post safety rules, inspection results, incident reports, and permits in each case, as required by law.

## **5. Environmental Protection**

### **5.1.Environmental Policy**

Atlantic expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters.

### **5.2.Operation of Supplier's Facilities**

Suppliers are to demonstrate good stewardship of the environment while working to reduce the environmental impacts of their operations. Supplier shall operate its Facilities in compliance with all environmental laws, including laws and international treaties relating to:

- waste disposal;
- emissions;
- discharges; and
- hazardous and toxic material handling.

### **5.3.Inputs and Components**

The Supplier must ensure that the goods it manufactures (including the inputs and components it incorporates into its goods) comply with all environmental laws and treaties. The Supplier must ensure that it will only use packaging materials that comply with all environmental laws and treaties.

- Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.
- Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled, and treated as required prior to discharge or disposal.
- Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.
- Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

## **6. Ethical conduct**

### **6.1.Corruption**

Atlantic expects its suppliers to adhere to the highest standards of moral and ethical conduct, respect local laws, and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

## 6.2. Conflict of Interest

Suppliers to Atlantic must disclose to Atlantic any situations that may appear to be conflicts of interest and notify Atlantic if any employee or others under the contract of Atlantic has any financial ties in the Supplier's business. In the occurrence of any such event, Supplier is responsible for reporting it promptly to the point of contact mentioned in Section 7.

## 6.3. Intellectual Property

Suppliers may be asked to sign Atlantic's Non-Disclosure Agreement (NDA) at the time of their prequalification. As per the agreement, the Supplier must keep confidential all Confidential Information Atlantic disclosed relating and not limited to the Atlantic's business, operations, assets, liabilities, plans, prospects, and affairs, regardless of whether such information is in oral, visual, electronic, written, or other form and whether or not it is identified as "confidential."

## 6.4. Diversity, Ethics, and Inclusion (DE&I)

We firmly believe in the power of diversity, ethics and inclusion to drive innovation, excellence, and sustainable growth. We are committed to cultivating a supplier network that embraces diversity, ethics and inclusion in all its forms, including but not limited to race, ethnicity, gender, age, religion, disability, and sexual orientation. **Report Violations**

The Supplier or any individual in connection shall self-report violations of the Code of Conduct by any of the below options:

- Go to the secure website at <http://www.clearviewconnects.com/>
- Over the phone through the Atlantic Packaging Products Ltd. dedicated toll-free number 1-866-887-3829
- By mail through the confidential post office box at ClearView Connects, P.O. Box 11017, Toronto, Ontario M1E 1N0.

Supplier shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behaviour or sought advice regarding this Code of Conduct.

## **7. Compliance with Laws**

Supplier shall comply with all applicable federal, provincial, territorial and local laws and regulations, including laws and regulations relating to all the Standards.

## REVISION LOG

<b>Revision Date</b>	<b>Summary of Changes</b>	<b>Details</b>
09-22-23	Original Release	Matt Niejadlik
12-07-23	Simplification of Clauses	Heather Fedash