

California Transparency in Supply Chains Act Disclosure

SIGNODE INDUSTRIAL GROUP (“SIG”) is committed to supporting California consumers in their goal to ensure the protection of human rights and the prevention of human trafficking by complying with the California Transparency in Supply Chains Act in our labor practices and business activities.

Our Statement of Principles of Conduct recognizes that forced labor, child labor, domestic servitude, workplace abuse, and trafficking can take many forms; therefore we require the fair treatment of our employees and related third parties throughout all aspects of the employment or business relationship. Additionally, we request our suppliers comply with our company principles or provide their own Code of Conduct to ensure our values are aligned. SIG would not knowingly do business with suppliers who violate laws for the protection of human rights or human health and safety.

Verification

SIG conducts pre-qualification audits and assessments of its Distributors and Agents through the use of third party software which reviews government lists and other public resources for any negative information. Our individual business units support our efforts by generally asking new suppliers complete questionnaires that collect information used for screening activities. SIG routinely consults other sources, including Transparency International’s Corruption Index for high risk locations, and concerns about specific industries.

Supplier Audits

We do not have an enterprise-wide audit process to evaluate supplier compliance with company standards for trafficking and slavery in our supply chains; however we do ask for the right to audit transactions covered by any written relationship agreement.

Supplier Certification

SIG requests all Distributors and Agents to abide by our Statement of Principles of Conduct or by their own Code of Conduct which should contain comparable or reasonable obligations similar to the ones contained in our Principles. Our Distributors and Agents are also asked to make a representation that they agree to comply with all applicable local laws and government regulations.

Internal Accountability

SIG has conducted periodic internal audits of our individual business units to check for non-compliance with our Distributors and Agents policy. If violations, or potential violations, are discovered, SIG will work in good faith to mitigate those issues; including disciplinary measures up to termination of employment, discontinuation of business relationship, and/or reporting misconduct to relevant government authorities.

Training

SIG offers annual online training to various employees on a number of various ethical issues impacting the company. In addition, these employees are asked to acknowledge that they have received and read our Statement of Principles of Conduct, as well as recertify their commitment to act ethically each year.