



Container Technologies

Ring Environmental, Social, and Governance Policy

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ESG 01.00 SUPPLIER CODE OF CONDUCT

Ring Container Technologies' Supplier Code of Conduct

Introduction

Ring Container Technologies (Ring) is guided by our mission to be a leading manufacturer of plastic containers for food and other packaged products by continuously improving our products and services to meet our customers' needs. Our mission is underscored by foundational values: demonstrating respect, compassion, and dignity for all people, and advancing continuous growth and improvement. In keeping with our mission and values, we expect our suppliers and their respective supply chains to act in accordance with this Supplier Code of Conduct.

Working together across our supply chains, we will encourage and enable sustainability and long-term positive impacts on the global community. Our Supplier Code of Conduct aligns with the United Nations Sustainable Development Goals and principles on human rights, labor, environment, and anti-corruption. This Supplier Code of Conduct helps Ring ensure that our supply chain, and by extension our customers' supply chain, adheres to high standards of safe working conditions, environmental standards, fair and respectful treatment of employees, contractors, and subcontractors, and ethical practices. By acknowledging this Supplier Code of Conduct, the Supplier confirms that for all existing and future business relationships with Ring, the Supplier will comply with the requirements of this Supplier Code of Conduct.

To ensure compliance with this Code of Conduct, Ring may request our Suppliers to complete an additional self-assessment questionnaire or may conduct onsite or virtual audits of our Suppliers' operations.

General Requirements

Ring expects its suppliers to conduct their business ethically, apply high standards of corporate conduct, and to act in full compliance with all relevant laws and regulations. This Supplier Code of Conduct is not and should not be interpreted to circumvent or undermine any applicable laws, rules, or regulations. Ring prohibits improper, unethical business conduct of any sort; our suppliers must confirm that their business practices meet, at a minimum, the requirements set out in this Supplier Code of Conduct.

1. Environment Requirements

1.1 Suppliers must comply with all relevant laws pertaining to the environment and should be committed to a continual improvement process in environmental management. Suppliers shall keep and maintain all applicable environmental permits and make them available for Ring to review upon request.

1.2 Suppliers should take a proactive, precautionary approach to managing their environmental impacts.

1.3 Suppliers should:

1.3.1 minimize the consumption of natural resources (e.g., water efficiency, energy efficiency).

1.3.2 ensure that all materials are traceable and, where practicable, that materials originate from a sustainable or recycled source.

1.3.3 actively reduce adverse environmental impacts, including pollution, in the communities in which they operate.

1.3.4 ensure that any hazardous or toxic waste is properly identified and disposed of by authorized bodies.

1.4 Suppliers should have a written environmental or sustainability policy appropriate to the size and nature of their operation which addresses prevention, mitigation, and management of serious environmental and health impacts from their operations.

1.5 Suppliers should actively work towards reducing their greenhouse gas emissions. Suppliers that calculate their Scope 1 and Scope 2 greenhouse gas emissions inventories should share the most up-to-date results of their Scope 1 and Scope 2 greenhouse gas inventories with Ring upon request.

1.6 Suppliers should undertake initiatives to promote greater environmental responsibility and shall strive to conduct business in a sustainable manner.

2. Social Requirements

2.1 Suppliers must comply with all relevant laws pertaining to human rights.

2.2 Suppliers shall make sure that they are not complicit in human rights abuses. Suppliers should take appropriate steps to identify and eradicate modern slavery, in all its forms, including slavery, servitude, forced and compulsory labor, and human trafficking.

2.3 Suppliers shall not directly or indirectly use child labor. Suppliers must comply with the minimum employment age limit defined by national law or by International Labor Organization (“ILO”) Convention 138, whichever is higher, per [Convention C138 - Minimum Age Convention, 1973 \(No. 138\) \(ilo.org\)](https://www.ilo.org/dyn/convenc/declaration/138)

2.4 Suppliers shall be equal opportunity employers, where no job applicant, employee, or any other individual affiliated with the business is discriminated against and less fairly treated because of actual or perceived race (including color, castes, nationality or ethnic origin), disability, gender, religion, age, marital status, sex (including pregnancy, sexual orientation, or gender identity), union membership, political affiliation, being a member of a protected class under international human rights law or any other conditions not justified in relevant law or relevant to the performance of the job. Suppliers must have policies and procedures in place to protect against discrimination, harassment, and coercion.

2.5 Suppliers shall provide a safe, healthy, and clean workplace for all personnel, including employees, contractors, subcontractors, and visitors. All relevant laws pertaining to health and safety must be complied with at all times. Suppliers shall be prepared to execute emergency response plans in the event of an emergency situation.

2.6 All terms and conditions of employment must be made clear to the workforce in a manner which is easily understood by that workforce. The Suppliers must fully comply with all applicable laws and regulations when setting employee conditions on working hours, benefits, and wages (such as minimum legal wages).

- 2.7 Suppliers shall provide workers with clear, fair, and uniformly applied disciplinary practices and grievance procedures.
- 2.8 Suppliers shall recognize the rights of workers to form or join trade unions which are free to meet without hindrance and to bargain collectively.
- 2.9 Suppliers should promote diversity within their own organizations and supply chain. Further, Ring expects suppliers to agree to provide evidence of their commitment upon reasonable request.
- 2.10 Suppliers should provide training, including that required under relevant law and industry specific training (whether mandatory or best practice) to workers.
- 2.11 Suppliers should partner with local communities to improve the educational, economic, and social well-being of the people who live there.
- 2.12 Suppliers that employ subcontractors to supply goods and services to Ring must disclose the names of all subcontractors to Ring upon request. Suppliers are responsible for ensuring that all such contractors comply with this Code of Conduct.

3. Governance Requirements

- 3.1 Suppliers must comply with all relevant laws and regulations pertaining to bribery, corruption, fraud, money laundering, terrorist financing, and tax evasion, and must not do or omit to do anything which would cause Ring to be in breach of such relevant law.
- 3.2 Suppliers must work against corruption in all its forms, including extortion and bribery, and prohibit offering, promising, giving, accepting, or soliciting an advantage as an inducement for an action which is illegal, unethical, or a breach of trust.
- 3.3 As part of the prevention, identification, and detection of the issues listed in 3.1, suppliers should implement mandatory training for workers, appropriate oversight, regular risk assessments, appropriate due diligence, and procedural audits.
- 3.4 Suppliers should encourage workers to promptly report if they know of or suspect any business activity deemed illegal, immoral, illicit, or unsafe, and should implement disciplinary action for any individual failing to comply with such procedures. Suppliers shall ensure that workers do not suffer any adverse consequences for making a report in good faith or refusing to pay a bribe.
- 3.5 Suppliers should keep detailed records of the identification and prevention of issues listed in 3.1 and should promptly notify Ring upon becoming aware of any instance or suspected instance of illegal or unethical business conduct connected to the business relationship between Ring and the Supplier.
- 3.6 Suppliers shall not violate antitrust and competition laws in the countries in which they operate. Suppliers shall operate in fair competition and shall not engage in price fixing, price discrimination, or unfair trade practices that transgress federal or state law.
- 3.7 Suppliers shall not engage in a conflict of interest or the appearance of a conflict of interest or impropriety.

Data Protection and Information Security

- 3.8 Suppliers must comply with all relevant laws pertaining to data protection and must not do or omit to do anything which would cause Ring to be in breach of such relevant law. Suppliers shall have an established system for information security and data privacy to protect Ring's information from being shared, changed, or destroyed by unauthorized parties.
- 3.9 Suppliers should not share or exchange any price, cost, or other competitive information or undertake any other collusive conduct with any other third party to Ring with respect to any proposed, pending, or current Ring procurement.
- 3.10 Suppliers should respect intellectual property rights and safeguard customer information. Transfer of technology and knowledge shall be done in a manner that protects intellectual property rights. At no

time, should Ring’s intellectual property rights be infringed. Suppliers shall maintain controls to safeguard Ring’s name, logo, trademarks, inventions, designs, confidential information, and other intellectual property against unauthorized use, modification, and damage.

3.11 Suppliers should protect the reasonable privacy expectations of personal information of everyone the Suppliers does business with, including sub-suppliers, suppliers, customers, consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

3.12 Suppliers should implement processes to address the confidentiality and protection of a whistleblower who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

Violations of the Code

Supplier shall promptly report to Ring any known breach of this Code. If a Supplier fails to meet the requirements of this Supplier Code of Conduct, the Supplier shall be required to implement a corrective action plan to remedy the non-compliance(s) with Ring’s Supplier Code of Conduct. Ring reserves the right to hold Supplier responsible for reasonable costs of investigating non-compliance. Ring reserves the right to terminate our business relationship with any Supplier that fails to comply with this Code of Conduct. Additional questions about this Supplier Code of Conduct should be sent to supplychain@ringcontainer.com.

REVISION HISTORY

| Revision | Date | Description of Changes |
|----------|------------|--|
| 1 | 05/01/2022 | <ul style="list-style-type: none">• New policy |