

The Silgan Dispensing Systems Supplier Code of Responsibility for Compliance with the California Transparency in Supply Chains Act of 2010

Silgan Dispensing maintains a valuable reputation in the business community for honesty and fair dealing by acting ethically and in accordance with the laws applicable to its business. It is Silgan's expectation that each of its suppliers will likewise conduct its business in a legal and ethical manner.

The California Transparency in Supply Chains Act of 2010 ("California Law") addresses issues of slavery and human trafficking, which are crimes under state, federal and international laws. In support of this law, Silgan requires that its major manufacturing suppliers comply with their obligations under the California Law. Specifically, in supply agreements executed after the effective date of the California Law, Silgan requires certification of compliance with the California Law by those suppliers that are covered by the law, and that the supplier comply with laws regarding slavery and human trafficking in the countries in which the supplier produces its products. Silgan verifies such compliance in periodic contractual compliance audits that Silgan conducts. At times of contract renewals, Silgan reviews the certifications from these suppliers as it assesses their performance and determines which suppliers it will continue to do business with. Thus, Silgan maintains internal standards and procedures for its employees and contractors that fail to meet Silgan's standards regarding slavery and human trafficking. Silgan conducts training sessions on a periodic basis for Silgan purchasing managers with respect to the California Law.