



**SUPPLIER CODE OF CONDUCT**  
**SILGAN DISPENSING SYSTEMS CORPORATION**

Silgan Dispensing Systems conducts its business in a way that makes us proud and we expect that you, as our supplier, conduct your business in a way that makes us proud to use you as a supplier. This obligation extends to all areas of our business and we expect that our suppliers operate in a way that supports and respects ethical business practices and fair dealing, human rights and worker safety, as well as the environment.

As a cornerstone of your business we expect that you adhere strictly to all applicable laws and regulations in the areas in which you operate. Additionally, we expect you to adhere to this Supplier Code of Conduct. You should incorporate these standards into your business practices, communicate them to your employees, and require the same of your suppliers.

***Legal Compliance and Business Integrity.*** SDS conducts its business fairly and honestly at all times.

- ***No bribery.*** SDS does not tolerate bribery of any form, whether direct or indirect. Supplier must adhere to the U.S. Foreign Corrupt Practices Act regardless of the country in which supplier is located or incorporated. We define bribery as a gift or entertainment that is given or received with the intent to affect the business judgement of the recipient or to influence a business decision. While it is common business courtesy to pay for or accept ordinary and occasional business meals and entertainment, Supplier shall not offer cash, favors, gifts or entertainment to SDS employees or third parties on SDS's behalf if such gift influences or could appear to influence, any business decision.
- ***Fair dealing.*** We always seek to deal fairly with our customers, suppliers, competitors, employees and others. We support open competition and will not engage in price fixing or other anti-competitive practices. We value the best interest of SDS and require all employees to avoid situations in which a conflict of interest arises between personal interests and the interests of SDS. We expect you to respect and cooperate with these policies and conduct all business transactions with fairness and integrity.
- ***Protection of Confidential Information.*** The sharing of confidential information will enable us to maximize the mutual benefit of our relationship. We will protect Supplier confidential information and we require the same protections for SDS confidential information. Suppliers must also take reasonable steps to safeguard any personal data of SDS employees provided to the Supplier as a result of Supplier's business relationship with SDS.

**Respect of Human Rights.** We expect you to treat all workers with human dignity and respect.

- *No Child labor.* Specifically, you may not employ workers under the age of 15, or under the local legal minimum age for work or mandatory schooling, whichever is higher.
- *No forced labor.* You may not utilize or benefit from forced or compulsory labor. The recruitment, transportation and harboring of workers by means of threat or coercion is prohibited.
- *Fair wages and working conditions.* All workers shall be paid a fair wage, including benefits, overtime (if applicable) and paid leave. Such wages shall be at least equal to the applicable minimum wage and statutory benefits. The terms of an employees' employment should be documented in writing and shared with the employee in a format that is easy to understand. Supplier must comply with applicable laws relating to working hours and all work shall be on a voluntary basis.
- *No discrimination.* Hiring and employment decisions should be made solely on the basis of skill, ability and the performance of workers. Discrimination based on race, gender, color, national or ethnic origin, religion, age, sexual orientation, disability, or other status protect by applicable law in the hiring, promotion, compensation or retention of employees is strictly forbidden. We do not discriminate, and will not tolerate discrimination, in employment, including hiring and advancement, on the basis of race, color, religion, gender, social or ethnic origin, age, marital status, pregnancy, political belief, disability, sexual orientation, union membership, or any other status prohibited by applicable law.
- *No harassment.* Abusive, harassing or offending conduct is unacceptable, whether verbal or physical. You may not tolerate such conduct, bullying, abuse or threats in the workplace.
- *Freedom of Association.* Supplier must recognize rights of workers to freedom of association and collective bargaining. Workers should not feel compelled to join or refrain from joining any organization.
- *Health and Safety of Workers.* We all share in the responsibility to maintain a safe workplace. Supplier must provide a safe and healthy working environment for its employees to prevent accidents and injuries, including adequate training, safety equipment, preventative maintenance.
- *Conflict Minerals.* Suppliers shall disclose if is providing to SDS any products containing "3TG" metals (tin, tantalum, tungsten or gold) that were sourced from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda or Zambia.

**Quality and Safety.**

We are dedicated to providing safe products to our customers that are high in quality. We expect you to provide to us products or services that meet applicable laws and specifications as well as quality standards, with special care in the areas of food quality and medical products.

### ***Care of the Planet.***

We are committed to careful protection of the environment, including using responsibly sourced materials. Supplier must operate in a manner that reduces its impact on the environment. At a minimum, supplier must fully comply with the letter and spirit of applicable environmental laws and regulations, including obtaining and maintaining necessary permits. Supplier should measure and track its environmental impact with a goal of improving its environmental performance.

This Code applies to all suppliers that provide goods or services to SDS or any of its SDS affiliates. Supplier is responsible for ensuring that its employees and suppliers adhere to these principles as well. Supplier is expected to keep accurate and complete and transparent business records evidencing its compliance with this Code and to make such records available to SDS upon reasonable request

SDS may update this policy at any time, with or without notice to you. The Supplier Code of Conduct can be found on our website at: <https://silgandispensing.com/resources>. While Suppliers are expected to self-monitor and demonstrate their compliance with this Code of Conduct, SDS may audit suppliers or inspect suppliers' facilities to confirm compliance. Should you become aware of any suspected violation of this Code, you are required to immediately provide this information to SDS: Silgan Dispensing Systems Corporation, 1001 Haxall Point, Suite 701, Richmond, Virginia 23219, Attn: General Counsel or [agreements@silganlegal.com](mailto:agreements@silganlegal.com). SDS may request that a Supplier implement corrective measures or may terminate its business relationship with any supplier that fails to meet the requirements of this Code. If you have any questions about this Code or your responsibilities please reach out to your SDS contact or the General Counsel for more information.

November 2019