

MENASHA SUPPLIER CODE OF CONDUCT

1. PURPOSE AND APPLICABILITY

Menasha Corporation and its operating businesses' mission is to help customers protect, move, and promote their products better than anyone else. We accomplish this mission, in part, through partnerships with suppliers that share our commitment to safety, quality, and value as well as operating in a manner that focuses on integrity, respect, and doing the right thing.

To assist suppliers in understanding and meeting Menasha's expectations, Menasha has published this Supplier Code of Conduct, which applies to all businesses and persons that produce goods or provide services for Menasha Corporation, Menasha Packaging Company, LLC, and ORBIS Corporation, and each of their respective subsidiaries, joint ventures, divisions, and/or affiliates, which will be collectively referred to throughout this Code as "Menasha."

While Menasha recognizes that legal requirements and cultural norms vary in a global business environment, this Code sets forth certain universal requirements that suppliers of Menasha must follow and provides the foundation for Menasha's ongoing evaluation of its suppliers.

2. COMPLIANCE WITH LAWS

Suppliers that produce goods for Menasha or provide services to Menasha must, at all times, comply with the laws of the countries in which they operate and with all other applicable laws, rules, and regulations, including those related to labor, worker health and safety, and the environment. Further, Menasha expects its suppliers to conduct business honestly, ethically, and in a way that reflects positively on Menasha.

While suppliers must comply with all applicable laws and regulations, the following are a few examples of important areas of legal compliance:

(a) **Bribery/Corruption of Government Officials**

Suppliers must follow all anti-bribery laws throughout the world and educate their employees about compliance with these laws. This includes compliance with anti-bribery laws concerning maintaining books and records.

(b) U.S. Export Laws and Sanctions

As a U.S.-based company, Menasha is subject to laws that regulate, restrict, and sometimes prohibit business dealings with certain countries, entities, and individuals. These restrictions include controls on the exports and re-exports of goods that originate in the U.S. or that contain U.S. parts, components, or assemblies. Suppliers must be aware of these restrictions and not take action that violates U.S. laws and regulations related to them.

(c) Fair Competition/Antitrust Compliance

Suppliers must comply with all applicable antitrust laws and regulations. Such laws deal with agreements among competitors, agreements with resellers, price discrimination, and other acts or situations that may unfairly reduce competition. If a supplier is under investigation for actions related to antitrust laws, it must notify Menasha immediately.

(d) Supply Chain Transparency

Suppliers must follow all applicable human trafficking and supply chain transparency laws throughout the world and educate their employees about compliance with these laws.

(e) Conflict Minerals

As a U.S.-based company, Menasha is required to track the use of certain minerals known as “conflict minerals.” Menasha encourages suppliers that manufacture components, parts, or products containing conflict minerals to track the use of those materials. Menasha expects all suppliers to adopt and communicate to their suppliers appropriate policies regarding conflict minerals.

3. EQUAL EMPLOYMENT OPPORTUNITY AND TREATMENT OF OTHERS**(a) Diversity and Inclusion**

Menasha believes in the value of diversity and endeavors to create and foster an inclusive workplace. Menasha believes that diversity in perspective enables companies to think in many dimensions. Making sure that everyone has a voice and bringing together people of different races, gender, education, language, viewpoint, and experience achieves richness in ideas that can solve problems.

To that end, Menasha expects suppliers to employ workers based on the following standards:

- A worker’s employment, wages, and benefits should not be based on race, color, gender, nationality, religion, age, maternity, sexual orientation, gender identity and/or expression, or marital status.

- Suppliers should demonstrate best efforts to achieve a level of diversity in the workforce that reflects the communities in which it operates.

Similarly, employees should be treated with dignity and respect. For that reason, suppliers must have and enforce a policy that prohibits inappropriate conduct in the workplace. No employee of supplier should ever take part in harassing behavior or create a hostile or offensive work environment. And suppliers should also have a process for anonymous disclosures, investigation, and resolutions of incidents that breach the policy.

(b) Forced Labor

Suppliers must not use involuntary labor of any kind, including prison labor, debt bondage, or forced labor by governments. Suppliers must not engage in or permit physical punishment of employees or psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal assaults.

(c) Child Labor

- Suppliers must comply with all applicable laws regarding the use of child labor, including those related to hiring, wages, hours worked, overtime, and working conditions.
- Only workers who meet the applicable minimum legal age requirement in the country where they are working or are at least 14 years old, whichever is greater, may be hired by a supplier. (Vocational or developmental programs for young people may be exempted from these age requirements.)
- Suppliers should encourage eligible workers, especially younger workers, to participate in the supplier's work-study programs and government-sponsored educational programs.
- Suppliers must maintain official documentation that verifies a worker's date of birth, employment history, and training history.

(d) Wages and Hours

- Suppliers must comply with all applicable laws regarding working hours, wages, and overtime pay.
- Workers must be paid at least the minimum legal wage or a wage that meets local industry standards.
- Suppliers must pay overtime and any incentive rates that meet all legal requirements or the local industry standards. Hourly wage rates for overtime should be higher than the rates for the regular work shift.
- When overtime is required, suppliers should conduct operations in ways that limit overtime to a level that ensures humane and productive working conditions.

- As a general rule, workers should have at least one day off in seven, and suppliers should not require, on a regularly scheduled basis, a work week in excess of 60 hours.
- Workers must receive paid annual leave and holidays as required by local law.

(e) Freedom of Association

Suppliers must respect all local laws regarding employees' freedom of association and not take unlawful actions to interfere with employees' rights. Freedom of association includes the right to bargain collectively or to belong to works councils.

(f) Political Activity

Menasha restricts the use of its name in political activity. Suppliers must not use Menasha's name in connection with any political activity, including legislative or referendum campaigns.

4. WORKING CONDITIONS

A safe environment in which all workers are treated with dignity and respect is a critical component of an effective relationship between Menasha and its suppliers. Menasha is committed to being a global leader in safeguarding the health and safety of its employees and contractors.

To that end, suppliers must adhere to the following guidelines:

- Suppliers must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection, and electrical, mechanical, and structural safety.
- Suppliers' work environment(s) should be well lighted and ventilated, and free from temperature extremes.
- Suppliers' work environment(s) must include sufficient, clearly marked exits that allow workers to evacuate in an orderly fashion in the event of an emergency, and suppliers should hold evacuation drills periodically to ensure that workers know what to do in the event of an emergency. Suppliers should ensure that exits remain accessible and unlocked during working hours.
- Suppliers must outfit its equipment with operational and safety devices and must inspect and service that equipment on a regular basis.
- Suppliers should have strict procedures that prevent the use of illegal drugs or alcohol in the workplace and that prohibit impaired employees from working.
- Suppliers should provide workers with, and ensure they properly use, appropriate personal protective equipment.

- Suppliers must maintain clean and sanitary bathroom facilities and not place unreasonable restrictions on their using during working hours.

5. ENVIRONMENT

Suppliers must comply with all applicable environmental laws, regulations, and standards. If these requirements are less stringent than Menasha’s requirements, suppliers are encouraged to meet the following standards:

- Suppliers must maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- Suppliers should have procedures for notifying authorities in case of an accidental discharge or release of hazardous materials into the environment, or in the case of any other environmental emergency.
- Suppliers must store hazardous and/or combustible materials in secure and ventilated areas and dispose of them in a safe and legal manner.
- Suppliers must comply with regulated substance and product content specifications, including laws requiring the identification, prohibition, or limited use of specific substances.
- Where feasible, suppliers should seek to use less hazardous alternatives.
- Suppliers should establish and maintain programs directed at minimizing industrial waste and pollution and encourage recycling.

6. CONFLICTS OF INTEREST

Suppliers must conduct business in a manner that is open, honest, and transparent. Suppliers must avoid conflicts of interest. There is the potential for a conflict of interest if an employee of supplier or his/her family member has a relationship with a Menasha employee who can make decisions that will affect the supplier’s business. Suppliers must disclose such relationships and any other potential conflicts of interest to Menasha.

Suppliers should have policies in place that avoid conflicts of interest and address the giving and receiving of gifts. When doing business with Menasha, suppliers may offer gifts and other business courtesies only in the following circumstances:

- The gift is for legitimate business purposes;
- The gift is unsolicited;
- The gift is not illegal or in violation of this Code;
- The gift is not a bribe, kickback, or other illicit payment;

- The gift is not given in exchange for any consideration; and
- The gift would not embarrass Menasha if it were disclosed and does not create the appearance that the gift-giver is entitled to preferential treatment.

7. INFORMATION SECURITY AND INTELLECTUAL PROPERTY

The secure use and distribution of confidential and proprietary information and data in the workplace is critical to Menasha and its suppliers' success in a competitive marketplace. Therefore, suppliers must maintain physical and electronic security for all confidential information, and employees of suppliers should use care in protecting confidential and/or proprietary information of any kind. If confidential and/or proprietary information is to be exchanged or discussed, Menasha and supplier must first ensure that they've signed and are in compliance with a confidentiality and/or non-disclosure agreement.

Suppliers must safeguard Menasha's intellectual property as well as the intellectual property rights of its other customers. Suppliers must also ensure that its suppliers respect Menasha intellectual property rights and immediately report to Menasha any violations of Menasha's intellectual property rights. Supplier should take appropriate steps to ensure that it does not supply any counterfeit or defective parts to Menasha.

8. ADMINISTRATION – COMMUNICATION, MONITORING, AND ENFORCEMENT

Suppliers must comply with this Code as a condition of doing business with Menasha. Menasha will maintain a system to assess and ensure compliance. A certification of compliance may be required on a periodic basis.

Suppliers must establish a proactive process to ensure compliance with this Code. Menasha understands that many suppliers have codes of conduct and/or policies that cover most or all of the topics addressed in this Code. As such, suppliers can use their own code of conduct and/or policies to meet the intent of this requirement. In any event, suppliers should make provisions for workers to anonymously report violations of this Code without fear of retribution.

Supplier shall allow Menasha or its representatives access to supplier's facilities and all relevant records upon reasonable request. Suppliers shall cooperate with Menasha in connection with any investigation regarding an alleged wrongdoing or breach of this Code. The actions of third-party agents or representatives (including government representatives) will be considered to be the actions of suppliers for the purposes of this Code.



If Menasha determines that a supplier has violated this Code, the supplier must provide information relating to the incident(s) and show within 30 days the actions taken to correct the condition. Menasha will follow up on commitments to correct the condition. In any event, Menasha reserves the right to immediately terminate any and all contracts with supplier for cause if supplier fails to perform any of its material duties or obligations hereunder, and such failure continues after notice is given to supplier requesting it to cure such failure. Menasha also reserves the right to hold suppliers responsible for reasonable costs of investigating and remedying non-compliance.