



# GREEN BAY PACKAGING INC.

Ethics & Compliance

## **CALIFORNIA TRANSPARENCY ACT**

Disclosure Information on California Transparency in Supply Chains Act of 2010

California Transparency in Supply Chains Act of 2010 (the "Act") requires companies with gross receipts of more than \$100 million identify themselves as manufacturers on their California tax returns and make specified disclosures on their website.

GBP strives for partnerships with suppliers based on mutual benefit, quality, performance and service. Our expectations of suppliers are that they will conduct their business ethically and comply with all applicable laws and regulations.

The State of California Transparency in Supply Chains Act requires that manufacturers and retailers disclose company efforts to eradicate slavery and human trafficking from the supply chain. The following outlines GBP's efforts:

## **VERIFICATION**

GBP conducts an assessment of suppliers within our product supply chain, on a number of parameters, including forced and child labor. The supply chain assessment and evaluation process includes contact with suppliers on an annual basis. GBP does not conduct third party audit verifications but reserves the right to conduct audits of suppliers to evaluate supplier compliance.

## **CERTIFICATION**

GBP makes concerted effort for direct suppliers to certify that materials incorporated into its products comply with the laws on slavery and human trafficking of the State of California. The majority of GBP's supply chain is within the United States of America, and all of its manufacturing activities are conducted in the U.S. GBP reserves the right to terminate supplier relationships when direct suppliers do not comply with relevant laws.

## **INTERNAL ACCOUNTABILITY**

GBP maintains internal accountability standards, a company code of conduct and procedures for employees and contractors. GBP employees are required to follow all laws and GBP policies. GBP communicates its expectations to suppliers relative to workplace standards. GBP reserves its contractual right to terminate relationships with suppliers that do not comply with such standards.

## **TRAINING & AWARENESS**

GBP regularly trains its employees in the standards of ethical behavior, policies and legal requirements expected in the conduct of business. GBP trains appropriate personnel on supply chain and sourcing expectations, particularly with respect to mitigating risks within its supply chain and supplied products.