Sealed Air Supplier Code of Conduct

1.0 Background

The Sealed Air Corporation (Sealed Air) is an international company with approximately 15,000 employees, serving customers in 122 countries around the world. Sealed Air is proud of its history of corporate responsibility with regard to our employees, the environment and the communities in which we operate. Sealed Air believes that in today’s global economy it is even more important for companies to act as responsible corporate citizens and to make their commitment known to responsible third parties, such as Sealed Air’s suppliers, vendors, contract manufacturers as well as customers. This Supplier Code of Conduct (“Supplier Code”) provides certain requirements of our suppliers, vendors and contract manufacturers (collectively, “Suppliers”) so that they may operate in a responsible manner while doing business with Sealed Air.

2.0 Scope and Application

The Supplier Code pertains to all Suppliers of Sealed Air. By supplying goods or services to Sealed Air, Suppliers agree to follow the Supplier Code.

At the sole discretion of Sealed Air, and in consideration of potential risks, the strategic nature of the Supplier relationship and the size of the business impacted, the Supplier Code will be:

- enforced and verified by audits to be conducted by Sealed Air;
- required to be acknowledged, approved, and signed by an authorized representative of Suppliers; and/or
- included in Supplier Agreements and Purchase Orders, respectively, [as applicable from and after the effective date of this Supplier Code].
3.0 Sealed Air Commitment to Sustainability

At Sealed Air, sustainability is a business imperative and a business driver critical to our long-term success. Ensuring that our Suppliers adhere to this Supplier Code is an integral part of our sustainability efforts. We encourage our Suppliers to actively promote sustainable development principles within their own operations and supply chain, such as those outlined in this document.

4.0 COMPLIANCE WITH LAWS

At a minimum, Suppliers will comply with all applicable local, national and international laws and regulations that apply to the conduct of their business with Sealed Air.

5.0 EMPLOYMENT PRACTICES:

Sealed Air is a global business operating in regions with diverse cultures, traditions, and social norms. Our Suppliers must conduct business in a manner that is consistent with Sealed Air’s ethical standards related to employment practices and working conditions.

As part of this commitment, we expect our Suppliers to conduct business in accordance with the Universal Declaration on Human Rights and Associated Covenants\(^1\) and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.\(^2\) We require our Suppliers to adhere to the international standards and follow the terms of this Supplier Code.

5.1 Child Labor

Suppliers shall only employ individuals who meet applicable local minimum age requirements. In addition, Suppliers must also follow the relevant ILO conventions, which ensure children are only employed when fully safeguarded from potential exploitation, when protected from health hazards, and when allowed to further their education.
5.2 Forced Labor
Employment must be voluntary and freely chosen. Suppliers will not utilize prison, forced labor, human trafficking, or modern day slavery in the manufacturing of its products or in its supply chain. Coercion, intimidation, or harassment of the workers by Suppliers is not acceptable.

5.3 Wages and Hours
Suppliers must provide wages and benefits that comply with applicable laws and agreements, including minimum wage, overtime, maximum hour rules, and meal and rest periods. In the absence of legal mandates, wage rates should be in accordance with local industry standards.

5.4 Diversity/Non-discrimination
Sealed Air is an Equal Opportunity Employer that values diversity and inclusion in our global organization. Suppliers must comply with all laws prohibiting discrimination in hiring and employment practices on the basis of race, religion, creed, national origin, gender, sexual orientation, gender identity or expression, age, disability, or other protected status. Suppliers shall be responsible to apply these non-discriminatory and equal opportunity practices.

5.5 Freedom of Association and Collective Bargaining
Suppliers must respect workers’ rights to form and join organizations of their choice and to bargain collectively without unlawful interference. Suppliers will not discriminate, harass, or penalize workers or worker representatives because of their interest and/or membership in, or affiliation with, a trade union, or their legitimate trade union activity.

5.6 Health & Safety
Suppliers will provide employees with a safe, healthy and hygienic working environment, including but not limited to adequate emergency procedures and fire safety, management of hazardous materials, and housekeeping. Where legal requirements for occupational safety do not exist, Suppliers must ensure the safety and well-being of employees by employing best
practices for health and safety, including but not limited to training, accident prevention initiatives, and injury to health associated with or occurring in the course of work.

6.0 Ethical Business Practices

High standards of ethical behavior and business practices are upheld by Sealed Air. Adherence to Sealed Air’s Code of Conduct is required by all employees globally. This document also sets forth the standards of behavior and conduct expected of Suppliers and can be found on the Sealed Air website. In the event of a conflict between the provisions in this Supplier Code of Conduct and the Sealed Air Code of Conduct, the document containing more stringent requirements shall control.

6.1 Fair, Ethical and Compliant Business Conduct

It is expected that while Suppliers conduct their business in a competitive way it is equally fair and ethical. Applicable competition laws and regulations must also be followed.

6.2 Confidentiality

As Sealed Air respects the confidential information of others, we expect our Suppliers to equally safeguard confidential information and not to share outside the appropriate circle of communication.

6.3 Conflict of Interests, Gifts, Entertainment and Donations

In order to prevent conflicts of interest, Suppliers shall not engage in any improper payments, offers, or solicitations to Sealed Air employees. Reasonable, noncash gifts having a token or nominal value are acceptable, provided that they are not intended and cannot be construed as a bribe, kickback, or other form of compensation to the recipient.
6.4 Anti-Corruption and Bribery

Sealed Air is fully committed to eliminate corruption from business transactions. We require that Suppliers are not only compliant with all applicable legal and ethical standards, but that Suppliers are equally committed to eliminate corruption in any of its forms, including bribery, facilitation payments, extortion, money laundering, and other illegal or unethical gratuities.

7.0 ENVIRONMENT

Sealed Air is committed to sustainability in all aspects of our operations. We are working to promote the efficient use of water, energy and raw materials, and reduce greenhouse gas emissions. We believe that efficiency and responsible use of resources lowers environmental impact, mitigates operational risk, decreases operational costs, and generates competitive advantage, not only for Sealed Air, but also for Suppliers. All Suppliers will conduct business in accordance with applicable local and national environmental laws. Where no local regulations exist, Suppliers are expected to operate in a manner that does not pose risks to the environment.

7.1 Operations

Suppliers should employ best practices to conserve raw materials, water and energy, and reduce greenhouse gas emission in their operations through source reduction, process improvement, use of alternative materials, and waste recovery. Suppliers are expected to have all applicable environmental permits in place.

7.2 Collaboration

We encourage Suppliers to actively participate in projects and initiatives that contribute toward Sealed Air’s sustainability commitments to jointly make a positive impact to the environment.
8.0 Non-Compliance

Suppliers found to be non-compliant with any of the provisions above agree to assist with the investigation and provide reasonable access to information requested. If corrective action is deemed by Sealed Air to be necessary, the Supplier agrees to develop a plan and mutually appropriate timeline to rectify the issue.

Sealed Air will collaborate with Suppliers to identify actions to reach full compliance with the terms of this Supplier Code. In case of prolonged or material non-compliance by any Supplier, Sealed Air reserves the right to review future business arrangements with any such non-compliant Supplier and may seek alternative supply from another Supplier as a remedy.

If Sealed Air employees or Suppliers suspect that a Supplier to Sealed Air is violating the Supplier Code, they should call the Integrity Line:

**By telephone:** 1-888-760-3137

Persons located outside the U.S. and Canada should first dial the AT&T Direct Code in their country and then either dial or ask the operator to connect them to the number listed above. The AT&T Direct Codes are available on the internet at: [http://www.business.att.com/bt/access.jsp](http://www.business.att.com/bt/access.jsp)

**By internet at:** https://integrityline.sealedair.com

**By mail addressed to:**

Integrity Line, PMB 3767
13950 Ballantyne Corporate Place, Suite 300
Charlotte, NC 28277
We hereby commit to follow the above Sealed Air Supplier Code.

____________________________________________________
Signature – Supplier Authorized Representative

____________________________________________________
Supplier Company Name

____________________________________________________
Date

Document History

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2 [www.ilo.org/declaration](www.ilo.org/declaration)
3 [https://sealedair.com/code-conduct](https://sealedair.com/code-conduct)