



Supplier Code of Conduct
Rev. January 14, 2025

Pactiv Evergreen Inc. and its direct and indirect subsidiaries (collectively, "**Pactiv Evergreen**") are committed to complying with applicable laws in all countries in which they do business and operating their businesses in an honest, socially responsible and ethical manner. Pactiv Evergreen wishes to do business only with suppliers of goods, services, advice, information or any other tangible or intangible benefit (a "**Supplier**" or "**Suppliers**") who share and uphold these principles. Pactiv Evergreen refuses to do business with Suppliers who do not share and uphold these principles. Pactiv Evergreen has adopted this Supplier Code of Conduct (the "**Code**") to set expectations for its Suppliers in this regard. This Code is in addition to, and not in lieu of, any other Pactiv Evergreen policies that apply to Suppliers. Pactiv Evergreen may add to and modify this Code at any time.

1. Compliance with Law. All business activities of a Supplier must conform to all applicable laws in the countries in which the Supplier does business, including, without limitation, laws that apply to labor, employment and human rights, environmental, health and safety in the workplace and ethics, compliance and anti-corruption. This includes complying with the U.S. Foreign Corrupt Practice Act, the U.K. Bribery Act of 2010 and similar anti-corruptions laws.

2. Anti-Corruption Policy. A Supplier will not make any payment, or offer anything else of value, either directly or through any intermediary, on its own behalf, on behalf of Pactiv Evergreen or on behalf of any other person, to any public official, political party or candidate for political office, or to any employee or representative of a state-owned enterprise, for the purpose of attempting to obtain, keep or direct business. A Supplier will not offer, promise or give a bribe to any person, whether public or private, or request, agree to receive or accept a bribe from any person, whether public or private. A Supplier will maintain complete and accurate records of all payments received from Pactiv Evergreen and made by or on behalf of Pactiv Evergreen. A Supplier will take affirmative steps to prevent bribery and similar corrupt practices from occurring within its organization and will take immediate corrective action when such misconduct is detected.

3. Payments, Gifts, Entertainment and Hospitality for Pactiv Evergreen Employees. The Pactiv Evergreen Code of Business Conduct and Ethics precludes employees from using their positions to obtain personal benefits from a current or prospective Supplier. A Pactiv Evergreen employee may not accept payments or similar cash equivalents (e.g., gift cards) from a current or prospective Supplier under any circumstances. A Pactiv Evergreen employee may not accept gifts, entertainment or hospitality from a current or prospective Suppliers *other than* gifts, entertainment or hospitality of nominal value and of a professional and customary nature which are not intended to influence, and are unlikely to be perceived as influencing, the award or retention of business with Pactiv Evergreen. Except for gifts, entertainment or hospitality of nominal value permitted under the prior sentence, a current or prospective Supplier will not offer or provide any payment, gift, entertainment, hospitality or other personal benefit to a Pactiv Evergreen employee. If a Pactiv Evergreen employee solicits a payment, gift, entertainment, hospitality or other personal benefit from a current or prospective Supplier in violation of this Code and the Pactiv Evergreen Code of Business Conduct and Ethics, Pactiv Evergreen requires the current or prospective Supplier to promptly report the solicitation to the company through one of the methods identified on the Pactiv Evergreen Ethics website at <https://investors.pactivevergreen.com/corporate-governance/ethics>.

4. Protect Information and Property of Pactiv Evergreen. A Supplier must protect any information and property entrusted by Pactiv Evergreen to the Supplier, including, without limitation, any drawings, plans, specifications, policies, procedures, manuals, trade secrets and other confidential or proprietary information, software, technology or other intellectual property, or any materials, tooling, equipment or other goods of Pactiv Evergreen or entrusted by a customer, supplier or other person to Pactiv Evergreen. A Supplier will safeguard such information and property against deterioration, damage, loss, misuse, mishandling, counterfeit, theft, fraud or other unauthorized disclosure or use. A Supplier will only use such information and property in accordance with applicable law and the terms of any agreement with Pactiv Evergreen and only for purposes authorized in writing by, and for the sole benefit of, Pactiv Evergreen. Under no circumstance will a Supplier use such information and property for any illicit purpose or in any manner that would adversely affect the interests or reputation of Pactiv Evergreen.

5. Environmental Commitment. Pactiv Evergreen expects its Suppliers to conduct their businesses in a manner that preserves and protects the environment. To minimize or eliminate negative impacts of their operations on the environment, a Supplier will use good faith efforts to minimize waste, promote energy efficiency and encourage the use of non-toxic and sustainable products.

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- 6. Conflict Minerals.** Conflict minerals include tantalum, tin, tungsten and gold, or their derivatives, as well as other minerals or derivatives as determined by the U.S. Secretary of State ("**3TG**"). Pactiv Evergreen is committed to the responsible sourcing of minerals used in its products and complying with conflict minerals related legal obligations where applicable. Pactiv Evergreen expects its Suppliers to share this commitment and to fully support us in meeting its regulatory requirements, including:
- a. Promptly, completely and accurately respond to Pactiv Evergreen's informational requests with respect to any conflict minerals that are necessary to the functionality or production of its products, including by completing and delivering the Conflict-Free Sourcing Initiative Conflict Minerals Reporting Template or similar survey (the "**Survey**");
 - b. In order to fully and accurately complete the Survey, Suppliers must (i) determine whether there is any 3TG contained in the components supplied to Pactiv Evergreen; (ii) survey their upstream suppliers regarding the ultimate source of any such 3TG; and (iii) verify and document such information;
 - c. Suppliers must implement policies and management systems to support compliance with these expectations and require their upstream suppliers to adopt similar policies and systems; and
 - d. Suppliers must cooperate with Pactiv Evergreen in the event Pactiv Evergreen determines that any further inquiry or due diligence is required or advisable with respect to the source of 3TG contained in its products.
- 7. No Forced Labor & Violence Against Workers.** Suppliers, including recruiters, employment agencies, sub-agencies, and recruitment firms, are prohibited from using forced labor and prison labor, trafficking in persons, and the procurement of commercial sex acts. All forms of forced labor are prohibited, including indentured labor, bonded labor (including debt bondage, trafficked or slave) or any other form of forced labor. All forms of prison labor are prohibited. Support for or engagement in any form of human trafficking or involuntary labor through threat, force, fraudulent claims, or other coercion is prohibited. The use of physical punishment, confinement, weapons, threats of violence, or other forms of physical, sexual, psychological, or verbal harassment or abuse by a Supplier as a method of worker discipline, control or any other reason is prohibited. Suppliers must inform employees, agents, sub-agencies, recruiters, contractors, and subcontractors about Supplier's policies that prohibit human trafficking, prison labor, forced labor, and other forms of slavery and provide training and programs to promote awareness, risk identification, employee reporting, corrective action, and potential penalties for violations.
- 8. No Child Labor.** Child labor must not be used under any circumstance. Suppliers must not place anyone under the age of 18, under the age for completing compulsory education, or under the legal minimum working age for employment, whichever requirement is most restrictive, on assignment at Pactiv Evergreen. Suppliers are required to have a remediation plan in place in the event child labor is found.
- 9. Reasonable Working Hours.** A Supplier must ensure that all workers who assist in supplying goods and services for Pactiv Evergreen do so in compliance with applicable laws pertaining to the number of hours and days worked. Workers are to be provided with reasonable daily and weekly work schedules and adequate allowance is to be made for time off. Overtime should be voluntary for workers except in unexpected and unusual circumstances required by business needs. Adequate time off shall be at least one day off per week unless the worker volunteers to work.
- 10. Fair Compensation.** A Supplier's workers must be fairly compensated and provided with wages and benefits that comply with applicable laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable laws. If applicable laws do not provide for overtime pay, a Supplier will pay at least regular wages for overtime work. A Supplier will not violate any applicable laws relating to the payment of wages or benefits.
- 11. Freedom of Association.** A Supplier must respect its employees' right to free association, their right to choose or not to choose collective bargaining representation, and their right to collectively bargain.
- 12. No Unlawful Discrimination.** Suppliers must commit to a workforce and workplace free of harassment, unlawful discrimination, and retaliation. Suppliers should ensure their business practices respect the rights of different demographic groups, including women, and migrant workers. While Pactiv Evergreen recognizes and respects cultural differences, Suppliers must provide equal opportunity in the workplace and reasonable accommodation, and not engage in harassment or discrimination in employment on the basis of age, ancestry, citizenship, color,

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family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, protected veteran status, race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable local laws, regulations, and ordinances.

- 13. Safe Workplace.** A Supplier will provide their workers with safe and healthy working and, where provided, living conditions. At a minimum, potable drinking water; adequate, clean restrooms; adequate ventilation; fire exits; essential safety and protective equipment, and related training; an emergency aid kit and access to emergency medical care; and appropriately lit workstations must be provided. In addition, facilities must be constructed and maintained in accordance with applicable laws. A Supplier will not endanger any worker's safety. If any worker's safety is threatened, a Supplier will immediately take steps to ensure that the worker's safety is no longer threatened. A Supplier will use their best efforts to eliminate or mitigate future threats to worker and worker safety. Accommodations, where provided, must be clean, safe, meet the basic needs of the resident workers, and comply with all applicable laws.
- 14. Worker Complaint Program.** A Supplier must implement and maintain a complaint program or other similar process for workers and other persons to report complaints and input and concerns to the supplier. A Supplier will solicit worker input when developing their complaint programs and will allow workers to participate in and/or manage the complaint programs. Supplier complaint programs will improve, both by intent and in practice, the Supplier's business culture, and the supplier will respond meaningfully to complaints with the intent to reach a resolution.
- 15. Product Safety.** A Supplier that manufactures, transports or stores materials used in the manufacture of food packaging or other food contact products, or that manufactures, transports or stores food packaging or other food contact products, must employ industry best practices in the manufacture, transportation and storage of such products. A Supplier must meet or exceed standards for product safety applicable in its industry, including those established by applicable regulators and consumer standards associations. The safety of products provided by a Supplier must also be protected by adequate security measures at all stages of production, packaging, storage and distribution in order to prevent tampering or contamination. A Supplier is expected to have in place proper procedures to identify potentially harmful products and complete an appropriate product recall, whether voluntary or mandated, in accordance with applicable laws and industry practices. Such procedures should ensure clear and prompt communication regarding such products to Pactiv Evergreen and the immediate removal of potentially harmful products.
- 16. Inspections.** A Supplier shall designate one or more of its management staff to be responsible for monitoring its facilities, and the facilities of its subcontractors and affiliates, for compliance with this Code. A Supplier must conduct such monitoring not less frequently than annually. Upon request by Pactiv Evergreen, a Supplier will complete and submit a "Certificate of Compliance" in the form provided by Pactiv Evergreen. If Pactiv Evergreen has a reasonable, good faith concern about a possible noncompliance with this Code, Pactiv Evergreen reserves the right to request from Supplier information which is necessary to verify compliance with this Code, to monitor Supplier's compliance with this Code, and to conduct or have its designee conduct, at Supplier's sole cost and expense, announced and unannounced inspections, audits, and evaluations of a Supplier and its business practices, records, facilities, and, where provided by a Supplier, worker housing accommodations, as well as private interviews with workers. Pactiv Evergreen may also conduct similar inspections, audits, and evaluations of a Supplier's subcontractors, affiliates and agents. A Supplier will keep all information necessary to document compliance with this Code readily accessible. A Supplier who refuses to allow such inspections or interviews, or who fails or refuses to provide a Certificate of Compliance or other information reasonably requested by Pactiv Evergreen, will be considered in material breach of this Code and any agreement with Pactiv Evergreen.
- 17. Compliance.** A Supplier and its affiliates, subcontractors, workers, and agents must comply with this Code or Supplier's own policies and code(s) of conduct which substantially comply/ies with this Code. The provisions of this Code shall apply to, and are for the benefit of, all of a Supplier's workers, laborers, staff, personnel, contractors, and agents. If a Supplier is in breach of this Code, Pactiv Evergreen, at its discretion, may elect to work with or provide guidance to the non-compliant Supplier to help the Supplier address and remedy the breach and to continue doing business with the non-compliant Supplier while it works to remedy the breach. In order for Pactiv Evergreen to consider assisting and continuing to do business with a non-compliant Supplier, the non-compliant Supplier must notify Pactiv Evergreen of the breach, cooperate in Pactiv Evergreen's investigation of the breach and make an immediate, good faith effort to remedy the breach. If Pactiv Evergreen elects to work with, or provide guidance to, or continue doing business with a non-compliant Supplier, the non-compliant Supplier must, at a minimum, establish



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clear goals toward meeting the standards set forth in this Code. Pactiv Evergreen may monitor a non-compliant Supplier's progress and make sure milestones have been satisfied and systems have been put in place to ensure compliance. Failure to comply with this Code will be sufficient cause for Pactiv Evergreen to revoke a Supplier's approved status and, at Pactiv Evergreen's option, to suspend performance under or terminate any agreements that Pactiv Evergreen has with such Supplier.

Approved

By: *Emelia Nossner*
Emelia E. Nossner
Chief Procurement Officer
Pactiv Evergreen Inc.