

# Policies on Business Conduct



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October 2023

Dear Sonoco Teammate:

There is a saying that character is what happens when no one is watching. Since Sonoco's founding in 1899, character has been a key component of our culture and core values. When you combine the importance that we place on demonstrating character in all situations, with our guiding principle of "always do the right thing," you have the pillars that form the foundation of our policies related to business ethics and conduct. Sonoco's culture, core values and guiding principle set the direction for the organization and represent an ethical compass when it comes to how the Company operates and conducts business on a daily basis with its colleagues, customers, suppliers and the community. They set the standard by which the Company and its employees measure every decision that's made.

Sonoco has not, and will not, permit any type of illegal, unethical, or improper behavior by any employee, regardless of position. Every employee is expected to conduct the Company's business in a fair and ethical manner. Our values dictate zero tolerance for any violation of the letter or intent of any applicable law or regulation.

The following guide was created to ensure that every employee understands Sonoco's business conduct policies and to provide helpful guidelines for behavior in specific situations. Please read it carefully.

Unfortunately, this manual can't possibly address every issue you may face. If you are at all unsure about the right way to respond to a situation, just ask yourself:

- **Is the action I am about to take legal?**
- **Are we being fair and honest?**
- **Do I think our actions will stand the test of time?**
- **How would I react if I read about this action in the local newspaper or on social media?**
- **Can I, with pride, tell my family what we did?**
- **Does this action put me or the company in a questionable situation?**
- **Does what I'm doing match and support our core values and guiding principle?**

**If you are not sure what the proper response to an issue is, or should be, please discuss it with your supervisor, designated Human Resources contacts, the Legal & Compliance Office, or contact Sonoco's Business Conduct Hotline (See page 18).**

Sonoco's reputation is our most valued asset, and it can be ruined by the actions of just one individual. It is up to each of us to help protect our Company's future by demonstrating the solid moral values and ethical behavior that have been cornerstones of our unique, people-based culture.

Sincerely,



**Howard Coker**  
President and Chief Executive Officer

## Who is Responsible for Following Our Policies on Business Conduct?

Sonoco's policies on business conduct apply to all employees, including senior management and the Board of Directors. Every Sonoco employee must abide by the same set of rules and expectations, regardless of job title or geographic location. In addition, Sonoco expects its business partners, including customers, vendors, contractors, and others who may be in the workplace, to follow similar standards.

## Purpose of Sonoco's Policies on Business Conduct

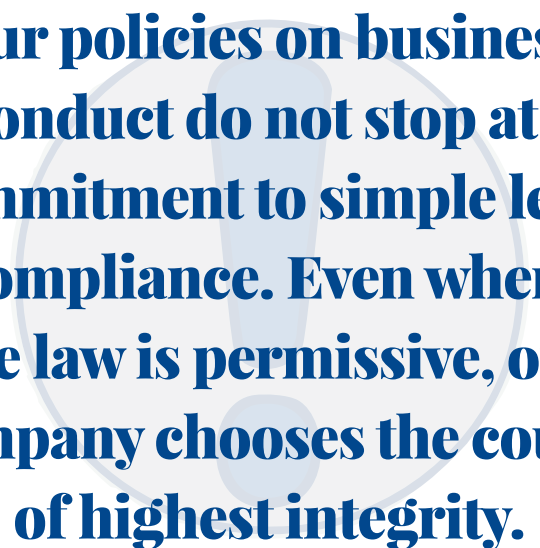
Sonoco is committed to the core values of honesty, integrity, and accountability. This commitment requires that our employees and directors comply fully with all laws, rules and regulations that apply to our business operations, and that they act honestly and ethically.

However, our policies on business conduct do not stop at a commitment to simple legal compliance. Even where the law is permissive, our Company chooses the course of highest integrity. Local customs, cultural norms, and traditions differ from place to place, and this must be recognized. But honesty is not subject to criticism in any culture. A well-founded reputation for scrupulous dealing is itself a priceless corporate asset.

Sonoco has adopted policies and guidelines that are intended to address and interpret many of these laws and regulations, and to make it easier to understand and implement them in day-to-day business operations. We expect all our employees to understand and comply with

these policies and guidelines. We expect our supervisors and managers to help employees understand and know how to abide by applicable laws, regulations, policies, and guidelines and to maintain compliance within their areas of supervision. We expect our business units to conduct their business activities to minimize compliance risks. We also expect our directors to lead by example by understanding and complying with the laws and regulations that apply to us, and by setting the tone for adherence to the highest ethical standards. Violation of applicable laws, regulations, or policies, or encouraging others to do so, puts Sonoco's reputation at risk, and there is no reason, including meeting financial or production business goals, that will ever justify any such violation.

Strict compliance with the "letter" of the law or policy is not enough. Ethical business conduct also requires compliance with the spirit of the law or policy. This policy manual is intended to serve as a resource to remind you not only of laws and policies that apply to our business, but also to help you identify legal and ethical issues that may arise, and to make wise and informed decisions about how to act. This manual does not address every law, regulation or policy that applies to our business, nor does it address every ethical issue that you might face. **If an issue is not addressed, or if you have questions about how a law or policy applies to a specific situation,**



**our policies on business conduct do not stop at a commitment to simple legal compliance. Even where the law is permissive, our Company chooses the course of highest integrity.**

**we expect you to use good judgment and to seek advice from supervisors and management or the Legal & Compliance Office. (See page 18 of this manual.)** The Company expects compliance with its standard of integrity throughout the organization and will not tolerate employees who achieve results at the cost of violation of law or who deal unscrupulously. Sonoco's directors and officers support, and expect the Company's employees to support, any employee who passes up an opportunity or advantage that would sacrifice ethical standards. Specific compliance procedures for our corporate policies can be found at the websites listed in this manual under the section "Additional Resources" on page 19.

Our policies on business conduct are intended to set forth goals and expectations for legal and ethical business behavior, and are not intended to, and do not in any way constitute an employment contract or an assurance of continued employment. Further, they are intended to ensure Sonoco operates in compliance with all applicable laws and regulations. As such, the policies on business conduct are intended to re-reinforce the Company's, employees', officers', and directors' existing obligations under the law and are not intended to create any additional obligations on the part of Sonoco.

## Safety

Safety is a cornerstone of the Sonoco culture. The Company is committed to establishing, managing, and maintaining a safe and healthy work environment for its employees, customers, vendors, contractors, and others who may be in our workplaces. Sonoco believes safety and good health are integral parts of its business strategy and are necessary for its success. We will design, manufacture, and distribute all products in a safe and responsible manner. We are committed to utilizing our human, physical and financial resources, as well as our technical capabilities, to their fullest extent to protect the health and safety of our employees and others.

### Things to consider

All employees are expected to fully accept responsibility for their own safety. Our basic philosophy is that personal injuries can and must be prevented. There is no place in Sonoco for an unsafe employee. Sonoco maintains a vigorous safety and injury prevention program at each location, including:

- Regular safety inspections
- A dedicated telephone number for medical, fire or security emergencies
- Evacuation drills
- Safety meetings
- Educational safety activities
- Severe weather safe rooms

While our work processes and policies are designed to minimize risk, all of us must routinely review and improve workplace conditions to ensure a safe and healthy environment. Unsafe working conditions anywhere within our global operations are unacceptable and should be reported to management. The health and safety of Sonoco's employees throughout the world are of utmost importance. More detailed information about Sonoco's commitment to occupational health and safety can be found in our Corporate Health and Safety Policy.

## Personal Conduct

Like other businesses, Sonoco must adhere to strict legal standards of personal conduct, along with its own standards of professional behavior. Each employee, officer, and director must conduct business in an ethical manner and in full compliance with the law.

### Diversity and Equal Employment Opportunity

Having a diverse workforce — made up of employees who bring a wide variety of skills, abilities, experiences, and perspectives — is critical to our success. Such an environment also helps us attract and retain the best talents and reach even higher levels of employee and customer satisfaction. We must value and respect the diversity of our employees, as well as our suppliers, customers, and any other person/group with whom we have interaction. Each of us is responsible for creating a culture of trust and respect that promotes a positive and inclusive work environment. This means treating each other with fairness and courtesy in all our interactions in our on-site and virtual workplaces. Sonoco is committed to providing equal opportunity in all its employment and purchasing practices to fully utilize the human and business resources available to us in our pursuit of customer satisfaction and shareholder return.

### Anti-Harassment

At the same time, Sonoco recognizes its own responsibilities to its employees and strives to provide a healthy, safe, and productive work environment. Sonoco prohibits any form of harassment in any company workplace. The policy prohibits unlawful harassment based on race, color, religion, sex, sexual orientation, age, national origin, disability, national origin or ancestry, sex, pregnancy, sexual orientation, marital status, gender identity or expression, age, disability, genetic information, veteran status or other factors that are unrelated to the Company's legitimate business interests, as well as any other form of harassment, even if the harassing conduct is lawful. The objective of this policy is to provide a work environment that fosters mutual employee respect and working relationships free of harassment. The Company specifically prohibits any form of harassment by or toward employees, contractors, suppliers, or customers.

Under the Company's policy, harassment is any inappropriate conduct, which has the purpose or effect of:

- creating an intimidating, hostile, or offensive work environment;
- unreasonably interfering with an individual's work performance; or
- affecting an individual's employment opportunity.

Harassment will not be tolerated. Forms of harassment include, but are not limited to, unwelcome verbal or physical threats, advances and sexually, racially, or otherwise derogatory or discriminatory materials, statements, or remarks. All employees, including supervisors and managers, will be subject to disciplinary action up to and including termination for any act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their supervisors, any member of management with whom they are comfortable, their designated Human Resources



**We must value and respect the diversity of our employees, as well as our suppliers, customers, and any other person/group with whom we have interaction. Each of us is responsible for creating a culture of trust and respect that promotes a positive and inclusive work environment.**

contacts or the Legal & Compliance Office. Reports may also be made confidentially and anonymously through the Business Conduct Hotline. All reports will be promptly and thoroughly investigated.

Employees or supervisors who observe or become aware of harassment should immediately advise their supervisors, higher management, their designated Human Resources contacts or the Legal & Compliance Office. No employee should assume that the Company is already aware of a problem. All complaints and concerns should be brought to management's, the Human Resources Department's, or the Legal & Compliance Office's attention so that appropriate steps can be taken.

### **Prohibition of Retaliation**

No retaliation will be taken against any employee because he or she reports a problem concerning possible acts of harassment. Employees can raise concerns and make reports without fear of reprisal. Questions about what constitutes harassing behavior should be directed to the employee's supervisor, Human Resources contacts, or the Legal & Compliance Office.

All employees are expected to understand and follow the Company's policies on Equal Opportunity, Harassment, and Open Door Communications. More detailed information about these policies can be found in SIMON ([link](#)).

### **Things to consider**

Practicing common courtesy and respect for co-workers will promote a good work environment. The activities listed below clearly do not promote a good work environment and are prohibited:

- Threats
- Violent behavior
- Sexual advances
- Possession of weapons of any type in Company operations
- Use, or being under the influence of, alcohol while on the job
- The use, distribution, sale, or possession of any illegal drugs
- Harassment
- Off-color jokes
- Racism
- Gambling
- Possession of pornographic materials

Employees who engage in any of these prohibited activities will be subject to disciplinary action, up to and including dismissal, at the sole discretion of the Company.

Employees under the influence of drugs, alcohol or controlled substances should never be on Company premises. Such behavior places the employee and everyone else at risk for a serious accident or injury.

Sonoco is committed to providing a workplace that is free of harassment or any other negative behavior that diminishes a person's integrity and self-esteem.

## **Human Rights and Fair Labor**

Sonoco is committed to upholding and protecting fundamental international human rights and believes that all human beings around the world should be treated with dignity, fairness, and respect. Sonoco does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or

unsafe working condition, and supports our products being free of conflict minerals. Forced or bonded labor in the production of Sonoco's products or services is prohibited, as is the employment of child labor of any kind. We require that our suppliers and business partners demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. Employees should exercise reasonable diligence to choose suppliers and business partners who meet these same standards.

Sonoco is committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

For additional information on this subject, consult Sonoco's Human Rights Policy and direct any questions to your designated Human Resources contacts or the Legal & Compliance Office.

## Fair Dealing

Sonoco employees, officers and directors should endeavor to deal fairly with Sonoco's customers, suppliers, competitors, and other employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. We are expected to treat everyone with whom we interact on Company business fairly.

## Conflicts of Interest

A conflict of interest arises when an employee or director places or appears to place their interests ahead of those of the Company. This can occur when an employee, officer, or director or a member of the employee's, officer's, or director's immediate family, directly or indirectly:

- Has a financial or personal interest in an entity with whom Sonoco has a contractual or other relationship.
  - Has a financial or personal interest in an entity with whom Sonoco is negotiating a contract or other transaction;
- or
- Receives personal benefit, other than approved compensation from Sonoco, because of such director's, manager's, or employee's position with Sonoco.

Employees, officers, and directors are expected to make or participate in business decisions and actions in the course of their service or employment with Sonoco based on the best interest of Sonoco, and not based on financial or other personal gain unrelated to Sonoco's interests. While conflicts of interest may arise from time to time (they are often unavoidable), the Company's goal is not to forbid such conflicts, but rather to establish a process for identifying and managing such conflicts so that decision-making can be performed by objective individuals. Transparency is an important part of managing conflicts of interest. For this reason, it is Sonoco's policy that all conflicts of interest (in fact or appearance) must be appropriately disclosed. To disclose a conflict of interest, follow instructions in the Conflict of Interest Disclosure Form. **If you have questions as to whether your circumstances should be formally disclosed as a conflict of interest, you are encouraged to reach out to your designated Human Resources contacts or contact the Legal & Compliance Office.**

### Things to consider

Employees, officers, and directors must avoid situations where their actions create, or appear to create conflict of interest with the Company. The following list outlines some activities that could possibly indicate a conflict of interest. Use it as a guide for the types of activities that must be avoided.

### **Outside activities that conflict with responsibilities to the Company**

Employees, officers, and directors must avoid outside employment or activities that might impair the effective performance of their job responsibilities to the Company, either because of excessive time demands or because those outside commitments might be contrary to Company obligations.

### **Gifts and entertainment from customers, suppliers or other parties doing business with the Company**

Employees, officers, and directors (or any member of their immediate families) are prohibited from soliciting or accepting gifts, gratuities, loans, payments or other favors from customers, suppliers or others doing business with the Company. Non-monetary gifts may be accepted only if they are items of nominal value or if they are advertising and promotional material clearly marked with company or brand names.

Unsolicited entertainment—a golf outing, tickets to a football game, a restaurant meal, or the like— may be accepted only if the entertainment occurs infrequently, it arises out of the ordinary course of business and it involves reasonable, not lavish, expenditures.

### **Gifts and entertainment for customers, suppliers or others doing business with the Company**

Similarly, employees, officers, and directors (or any member of their immediate families) are prohibited from offering gifts, gratuities, loans, payments or other favors to customers, suppliers or others doing business with the Company. Non-monetary gifts may be offered only if they are items of nominal value or if they are advertising and promotional material clearly marked with company or brand names.

Entertainment for customers, suppliers or others doing business with the Company is appropriate if it involves reasonable, not lavish, expenditures. Non-US operations may develop local Gifts and Entertainment policies to reflect applicable laws and social norms with approval from Regional HR Leadership. Any such policy will require Legal & Compliance Office approval before publication and implementation and must include value thresholds, limitation on frequency of gift giving and receipt, and compliance with local laws.

Company guidelines about payments to government officials, political parties and candidates are outlined under “Illegal Payments to Government Officials” on page 14.

### **Information**

We often have access to information regarding the Company’s financial position, its manufacturing activities and its future plans that is not available to or known by the general public until sometime in the future. Such information must not be disclosed to persons outside the Company or used by an employee for personal benefit or to benefit family members or friends.

### **Economic interests in vendors or purchasers of goods or services from the Company**

An employee, officer or director cannot have any undisclosed substantial financial interest in any corporation, partnership or other organization that is a current or prospective vendor or purchaser of goods or services from Sonoco if the person can influence decisions about Sonoco’s business with the organization.

A substantial financial interest is generally assumed to be more than one-percent ownership, or its equivalent. A vendor is defined as any person or entity that sells, rents, or agrees to furnish any materials, supplies, equipment, real estate, credit, insurance, or services to the Company or has done so in the past. Similarly, a purchaser is any person or entity that buys, rents, or otherwise procures materials, supplies, equipment, real estate, credit, insurance, or services from the Company or has done so in the past.

A conflict exists when an employee, officer or director uses Company equipment, personnel, or facilities for personal gain.

# Corporate Opportunities

Employees, officers, and directors are prohibited from competing with the Company in any manner. Occasionally, some employees, officers or directors may be aware of business and investment opportunities that are of interest to the Company. In such cases, those individuals are prohibited from taking advantage of any opportunity that may be discovered while employed by the Company, while serving as a director, or while using or having access to Company property and information. We are all required to advance the legitimate interest of Sonoco when such an opportunity arises. Failure to do so could create a conflict of interest in misappropriation of business opportunities and could result in disciplinary action, up to and including termination, at the sole discretion of Sonoco. Any benefit derived from your affiliation with Sonoco should be shared with the Company and not kept for yourself.

## Political Activities

Sonoco encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines. We may support candidates or organizations of our choice through personal contributions or by volunteering so long as we separate our personal political activities from our work. This ensures that we maintain transparency, honesty, and integrity with our stakeholders and each other. To achieve lawful participation in politics, employees must:

- Respect the political opinions of our co-workers and business partners even if they are different from ours, and do not impose our views on them.
- Refrain from engaging in political activities during company time or use company resources such as facilities, telephones, computers, or other supplies.
- Refrain from using Sonoco letterhead, company e-mail, or reference to a business address or title when expressing a personal view in a public forum (such as social media platforms).
- Not expecting or seeking reimbursement for personal political activity (i.e., contributions to a candidate or party).
- Obtain prior approval from the Legal & Compliance Office when running for office or upon appointment or election to office.
- Avoid contacting lawmakers on behalf of the Company or lobbying activities with lawmakers for the Company's interests without obtaining explicit advance approval from the Legal & Compliance Office.

## Protection and Use of Corporate Assets

It is the policy of the Company that every employee, officer or director has the responsibility to protect Company property against loss, theft, and misuse. All Company property should be used for legitimate business purposes.

**Corporate property includes such things as:**

### **Tangible property**

Inventory, office supplies, computer hardware and software, tools, equipment, vehicles, and cash.

Tangible Company property is intended for use by employees to achieve the Company's business objectives—do not help yourself. Employees must not take office supplies for personal use, use Company postage to mail personal letters or use a Company vehicle for personal benefit outside of stated policy.

### **Intangible property**

Engineering and manufacturing know-how and processes; business, financial, marketing, and strategic plans

associated with products; product plans with outside vendors or purchasers; and a variety of internal databases, patents, patent applications and copyrighted material.

Information, intellectual property (patents, trade- marks, copyrights, trade secrets and know-how) and innovative ideas are valuable Sonoco intangible assets that must be appropriately managed and protected. Information pertaining to acquisitions, divestitures, technology, competitive position, directional strategy, customers, vendors, employees, salaries, product costs, trade secrets, etc., must be protected from misuse or unauthorized disclosure.

As an employee, officer, or director, you are prohibited from using or disclosing Company-owned information except for the Company's business purposes. Disclosure of information within the Company should be on a need-to-know basis only. By accepting employment with the Company, you have agreed not to disclose or misuse the Company's proprietary information for any reason, both while you are employed and after you leave the Company.

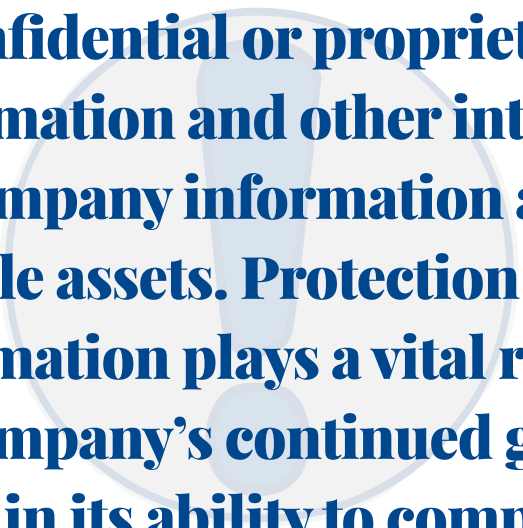
### **Employees' work time**

The Company requires employees to use Company time to perform assigned responsibilities rather than personal business.

### **Things to consider**

Each employee is responsible for the proper use, conservation, and protection of the Company's assets, including its property, plant, equipment, computer information and data, product designs, inventions and other proprietary business and technical information.

Sonoco policy and the law impose severe penalties against the theft or misuse of Company property. Employees must be particularly aware of the following categories of restrictions:



**Confidential or proprietary information and other internal Company information are valuable assets. Protection of this information plays a vital role in the Company's continued growth and in its ability to compete.**

### **Confidential or proprietary information**

Confidential or proprietary information is specific information about the Company's business— products, services, technology, or competitive data—that you have acquired in the course of your employment and the disclosure of which would be advantageous to competitors or detrimental to the Company.

Confidential or proprietary information and other internal Company information are valuable assets. Protection of this information plays a vital role in the Company's continued growth and in its ability to compete.

It is critical that all employees take appropriate measures to safeguard the security and confidentiality of these types of information. Employees and former employees shall not, without proper authority, give or release the Company's confidential or proprietary information to anyone who is not employed by the Company.

### **Company funds**

Every employee is responsible for the proper use of Company funds, including accurate reporting in Company financial reports. No payment to a supplier or to an employee on behalf of the Company shall be approved or made

with the intention or understanding that any part of such payment is to be used for any purpose other than what is described by the documents supporting the payment.

Each employee is personally accountable for any form of Sonoco funds entrusted to them— credit and purchase cards, tickets, cash, checks, etc.—and must ensure that the Company receives proper value in return. All business travel and entertainment expenses must be documented and recorded in compliance with Sonoco's travel and entertainment policies. If funds are used improperly or illegally, Sonoco will take the appropriate disciplinary action and may notify the appropriate authorities.

The Company will maintain no funds or assets for any illegal or improper purposes.

## Data Privacy

Protecting the privacy and security of personal information is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal information and holding violators accountable. Sonoco is committed to complying with applicable privacy laws in the countries where we conduct business, including laws regarding the cross-border transfer of certain personal information. Similarly, Sonoco respects the privacy of information obtained from its customers, suppliers, and third-party business partners and is committed to handling personal data responsibly and in compliance with all applicable privacy laws and company policies.

For more information on Sonoco's commitment to privacy and to understand what types of information are considered personal or sensitive according to applicable local laws, consult our Global Privacy Policy [ [www.sonoco.com/global-privacy-policy](http://www.sonoco.com/global-privacy-policy) ].

## Inside Information and Insider Trading

Inside information is information that would be important to a reasonable investor in deciding whether to buy, sell or hold stock.

Insider trading means using confidential, material, and nonpublic information about Sonoco and its customers, suppliers, or competitors to achieve an unfair advantage in the buying or selling of shares or other securities.

Information is considered material if there is a substantial likelihood that a reasonable investor would consider it important in arriving at a decision to buy, sell or hold Sonoco's stock or the stock of any of its business partners.

Because Sonoco's stock and other securities are owned and traded by the public, the Company is obligated by law to make prompt, full and fair public disclosure of information that may materially affect the market for our stock.

Employees, officers and directors who possess material, nonpublic information (possible mergers, acquisitions or divestitures, actual or estimated financial results, increases/decreases in cash dividends, stock dividends or splits, acquisition or loss of substantial contracts, new product development, major litigation, major changes in business strategies, etc.) about the Company or its business partners may not engage in any trans- actions involving stocks or bonds of the Company or those business partners about whom they have information until such information has been dis- closed to the public. They also should not, without proper authority, disclose such information to anyone outside or inside the Company.

Company employees, officers and directors who possess material, nonpublic information and who take advantage

of their position to profit or to minimize their losses at the expense of less informed investors may be held civilly or criminally liable with the possibility of substantial fines and/or imprisonment.

### Things to consider

While you as an employee, officer or director are prohibited from using material information for personal gain, you can be held civilly or criminally liable for doing so or for passing material information to anyone, including family members and friends, who may benefit from knowing and using material, nonpublic information for their personal gain.

Three simple rules can help protect employees, officers and directors regarding material, nonpublic information: (1) Do not use material, non-public information for personal gain; (2) Do not pass along such information to anyone else who has no need to know, and (3) Wait at least one business day after material, nonpublic information has been disclosed to the public by press release or similar announcement before trading in Sonoco's stock or the stock of its business partners. Sonoco may also impose additional restrictions on trading on its directors and executive officers.

Insider trading is both unethical and illegal. For further information regarding securities laws and insider trading, please contact Sonoco's Legal & Compliance Office as shown on page 18.

## Internet Access, Electronic Documents and Electronic Communications

Internet and e-mail resources are provided to many Sonoco employees to make business-related communication and information gathering easier. These electronic resources are the property of Sonoco and are intended for business use. Occasional personal use is acceptable, subject to conditions (e.g., if it does not interfere with work and if it is of limited duration and frequency). Information may be sent and received in text, sound (voice), image, video, social media posts or other formats. In the following, a "document" or "material" can refer to any of these formats. Electronic communications include email, social media (Facebook, Instagram, TikTok etc.), instant messaging, and peer-to-peer (P2P) messaging or texting.

### Things to consider

Here are some specific points of concern regarding Company electronic communications and Internet access:

#### Electronic communications

Anything sent or received via Company communications is subject to review by authorized Company officials only for specific purposes and, as reasonably necessary in the interests of the Company to the extent permitted by applicable law. The communications systems are Company property. Sending or receiving messages containing objectionable material is strictly prohibited. Sending chain letters and junk mail (spam) is similarly prohibited.

#### Internet access

Using the Internet or the Company's other data and voice networks to access any form of objectionable material is forbidden. This includes obscene material, defamatory material, sexually explicit material and anything else that might be offensive to others.

It is also forbidden to use the Company's Internet access for unlawful purposes or personal gain.

Confidential or proprietary Sonoco information should not be transmitted across unsecured public networks, including the Internet, without adequate safeguards. Employees should consult Corporate Information Services before transmitting confidential information using an unsecured public network.

All employees are expected to understand and follow the Company's policies on the use of electronic resources. More detailed information about these policies can be found in the U.S. Corporate Policies library in the internal SIMON portal ([link](#)).

## Antitrust

Antitrust laws (competition laws) are designed to prevent business activities that restrain trade by lessening competition so that companies can compete on an open, free, and equal basis. Such laws are in place in all countries where Sonoco does business.

Sonoco strictly forbids formal or informal agreements or understandings with competitors where the purpose is to influence prices, terms or conditions of sale, volumes of production, production restrictions, allocations to markets or limitations of quality.

All Sonoco employees, officers and directors are expected to comply fully with the antitrust laws of the United States and of all states and international locations in which the Company conducts business. Failure to comply with any antitrust law, whether domestic or international, will subject any employee, officer, or director to severe disciplinary action, including termination in appropriate circumstances. Criminal (heavy fines and/or prison terms) and civil (triple damages paid to injured parties and/or injunctions) penalties may be imposed on Sonoco, as well as any individual employee, if antitrust laws are violated.

Employees, officers, and directors are strictly forbidden to exchange information with competitors and potential competitors regarding production scheduling, distribution and pricing, terms or condition of sale, quality limitations, production volumes and/or restrictions, interaction with customers, market share or any other information in violation of antitrust laws.

It is Sonoco's intent to earn business by providing excellent products and services at competitive prices. Wherever we operate, we will conduct business in a legal and ethical manner.

### Things to consider

While all employees, officers and directors should be sensitive to antitrust laws in all of their dealings, membership in industry or trade organizations and attendance at meetings at which competitors will be present deserve special attention.

### Trade associations

Trade associations perform useful and legitimate business functions and can be supported by the members of an industry under appropriate circumstances. Employees should be aware that trade association meetings may result in informal meetings of competitors and may subject each person present to the risk of being suspected of improper activities, particularly if any action is taken by Sonoco or its competitors following these meetings that could infer collusion.

Employees are not permitted to join any trade association on behalf of the Company unless their department head, in conjunction with the Corporate Communications Department, has determined that the association serves an important and proper business purpose, and that counsel adequately supervises all of its activities.

Employees should periodically review trade association memberships with their managers to determine their ongoing value.

## Meetings

Attendance at meetings where competitors will be present can cause conflicts of interest. Such meetings should be avoided except with the department head's express prior approval. This approval may be general (recurring meetings such as trade association committees, research groups, etc.) or specific.

To minimize antitrust risks, these guidelines should be followed when preparing for and attending meetings with competitors:

1. Before a meeting, encourage the use of an agenda; review it before the meeting to identify topics that may involve antitrust risk, and request that questionable agenda items not be discussed.
2. At the meeting, encourage participants to follow the agenda; keep minutes of the proceedings; and avoid discussing sensitive topics such as prices, product development or marketing strategies. If inappropriate items are being discussed, ask that they not be discussed. If the request is denied, leave the meeting, and have your departure noted in the meeting minutes.
3. After a meeting, review the minutes for any reference to anything that could be deemed to be evidence of an illegal agreement. For example, watch for the use of terms such as "agree," "consensus" or "understanding." Such terms can be easily misconstrued.

For more detailed information about antitrust compliance, refer to Sonoco's Guide for Compliance with Federal Antitrust Laws: [Documents & Charters](#).

## Trade Compliance

As a global company, Sonoco is subject to laws and regulations in many jurisdictions around the world. Employees are expected to comply with the applicable laws wherever we do business. From time-to-time, governments establish trade controls that restrict business transactions with certain countries and parties and that affect the import and export of goods across national borders. Sonoco abides by all trade controls applicable to our business, and employees are expected to take steps to help ensure that the Company does not conduct business with prohibited parties or violate any applicable trade restrictions.

### Things to consider

To help ensure compliance with these various national and international laws and regulations, employees should adhere to the following:

- Never expand business into a foreign country where Sonoco has not previously done business without discussing it with management and Sonoco's Legal & Compliance Office.
- Be aware of dealings with countries that are involved in conflicts or that are subject to international sanctions.
- Observe all regulations and trade agreements that govern the shipment of Sonoco's products and services to the importing country.
- Be accurate when furnishing information to any person hired to facilitate export or import transactions; and Consult management or Sonoco's Legal & Compliance Office for specific guidelines to deal with any cross-border business.

The laws in this area can be complex, and they are subject to frequent change. Consult management or Sonoco's Legal & Compliance Office if you have concerns about any Company trade activity.

# Anti-Bribery & Anti-Corruption

Sonoco has an Anti-Bribery, Anti-Corruption and Foreign Corrupt Practices Act Policy that supplements and clarifies the Company's rigorous rejection of illegal and unethical payments as set forth in this section. This section should be read in conjunction with the Company's Anti-Bribery, Anti-Corruption and Foreign Corrupt Practices Act Policy.

## Illegal Payments to Government Officials

***Sonoco will not offer, authorize, make any illegal payments, or give anything of value, directly or indirectly, to government officials, political parties, or candidates for political office with the intent of influencing the performance of their official duties for purposes of obtaining or retaining business, or some other improper business advantage for the Company.*** The term "foreign official" is broadly defined in the FCPA. It means any employee or person acting in official capacity on behalf of a non-U.S. government or departmental agency, or of a designated public international organization.

Foreign officials also include officers and employees of companies under non-U.S. government ownership or control, such as national oil companies. The basic FCPA prohibitions also apply to any non-U.S. political party, party official, or candidate for political office.

***Employees should exercise reasonable diligence to determine that neither Sonoco's agents nor distributors are making any such improper or illegal payments.*** The Company has set forth a separate Third-Party Intermediary ("TPI") Due Diligence Policy to emphasize that Sonoco and its TPIs conduct their activities ethically and in compliance with all applicable laws and codes. Sonoco will not take actions indirectly through a third-party that it may not take directly, as Sonoco may be held responsible for the actions of its TPIs. Doing business ethically is a core value of the Company, and the Company is fully committed to fair and honest business practices in each of the locations in which it operates.

The Company prohibits facilitating payments (also known as "expediting" or "grease" payments) except in rare circumstances. Any proposal to make a facilitating payment must be authorized by the Legal & Compliance Office in advance, and the Legal & Compliance Office authorization will only be provided in circumstances in which the payment would be legal under all applicable laws. Similarly, contractors are required to comply with all applicable laws and are not authorized to make facilitating payments while carrying out work for the Company where prohibited by applicable law.

The Company prohibition on facilitating payments does not apply to payments that are made in the face of a threat to the health or safety of an employee. A demand by a government official for a



payment that is accompanied by a physical threat is extortion, and a payment in this case would not be considered a facilitating payment. Nevertheless, such a payment should be reported to Management and the Legal & Compliance Office, or through the Business Conduct Hotline as soon as possible.

#### **Commercial Bribery “Business to Business Bribery”**

Bribery and improper payments can also arise in situations that do not involve a government official. The exchange of appropriate gifts and entertainment is often a way to build our business relationships. However, we must conduct business with customers, suppliers, and government agencies (including U.S. and non-U.S. governments) without giving or accepting bribes including (but not limited to) commercial bribery and kickbacks.

- Commercial bribery involves a situation where something of value is given to a current or prospective business partner with the intent to improperly obtain business or influence a business decision.
- Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction.

Sonoco prohibits participating in commercial bribery and kickbacks, or even the appearance of it, in all our business dealings. Even in locations where such activity may not, technically speaking, be illegal, it is absolutely prohibited by our company policy. Moreover, we must only work with business partners who have a reputation for integrity and report any signs that a representative is unethical or could be paying a bribe.

Company guidelines about giving and receiving gifts (see Conflicts of Interest, page 6) apply in every country where Sonoco does business.


If you have questions about a particular type of payment, please contact Sonoco’s Legal & Compliance Office as shown on page 18.

## **Proper Accounting Procedures**

All Company financial transactions, accounting records, sales reports, expense statements, time records and other documents must accurately and clearly represent the event, the specific facts and the true nature of each transaction. Any employee involved in the preparation of such documents must execute them with total honesty, completeness, and accuracy. The same policies apply to domestic and international business. Corporate financial records must conform to generally accepted accounting principles. No entry will be made on Sonoco’s books or records that is intended to hide or disguise the nature of any transaction. Furthermore, there will be no unrecorded or off-balance sheet positions for any purpose.

#### **Fraud**

It is never acceptable to take part, no matter how small our role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. We participate in fraud any time we conceal, alter, falsify, or omit information in Sonoco’s records either for our benefit or at the direction of any others. Employees must refuse to engage in any questionable activities and have a duty to report any known or suspicious activity to their



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supervisor, designated Human Resources contact, the Legal & Compliance Office or through the Business Conduct Hotline.

## Environmental Laws

Sonoco is committed to protecting the environment. As one of the world's largest fiber recyclers, Sonoco's heritage is indicative of its respect for the environment and the needs and concerns of the communities in which we live and work. We all should strive to minimize waste, conserve energy and other natural resources, and promote reuse and recycling. There are a number of environmental laws to which the Company must strictly adhere, especially those pertaining to measuring, recording or reporting discharges and emissions to the environment and to the handling of hazardous waste. Employees whose work areas are impacted by environmental laws should be familiar with these laws, should actively participate in programs designed to facilitate compliance and should immediately report any violations to their supervisor or to the Legal & Compliance Office.

## Media Contact and Communications

The media—including newspapers, magazines, television, and radio—is a powerful tool. To avoid misunderstandings or inaccuracies and to help ensure consistency of message, all media inquiries are to be handled by the Corporate Communications department. Anyone receiving an inquiry from the media should contact the Vice President, Investor Relations and Corporate Affairs or the Director, Corporate Communications.

## Copyrights

It is the Company's policy and legal obligation to honor the copyrights of others. Employees, officers, and directors may not reproduce, photocopy, or electronically transmit any printed copyrighted work without permission of the author/publisher/ owner. Reproducing any intellectual property without the permission of the author/publisher/ owner jeopardizes its value and places the employee, officer or director and the Company in danger of infringement litigation.

## Asking Questions or Reporting a Concern

If you have any questions or concerns about proper business conduct, there are two important steps you can take to ensure that Sonoco's written commitment to ethical and legal business conduct is demonstrated in the workplace.

### Contact your supervisor if you have questions about proper business conduct

All managers maintain an open-door policy for employees with questions about proper business conduct. You are encouraged to bring up ethics questions before the fact, rather than after, so the proper course of action is taken. Never hesitate to talk to supervisors when you have a question about business conduct, no matter how small or insignificant it may seem.

### Duty to report violations

Any employee who becomes aware of a violation of any law or regulation or of Sonoco's policies on business conduct or believes that a violation may take place in the future must report the matter through the proper channels. If an employee, director, or officer is aware of an actual or potential violation and fails to report it, the failure to report may lead to discipline, up to and including termination of employment. You may report violations in several ways:

- To your supervisor or another member of management with whom you are comfortable.

- To your designated Human Resources contacts
- To the Legal & Compliance Office
- Through the Business Conduct Hotline, which is independently operated 24 hours a day, seven days a week. An interview specialist documents your concern, assigns you a personal reference number and relays your concerns to the Company.

It is important that your report contains enough specific information to allow for an objective investigation.

Any investigation with respect to alleged unethical or illegal activities will be conducted in a competent and fair manner with equal respect being given to individual rights and Company objectives. Any employee found to be in violation of Sonoco's policies on business conduct will be subject to discipline, including termination of employment.



To ensure that a reporting employee is protected from reprisal, requests for anonymity will be respected to the extent that this does not result in the violation of the rights of another employee or make it impossible to conduct a proper investigation. Any attempt at reprisal against the reporting employee will be punished severely.

# Contact information

## Legal & Compliance Office

1 North Second Street

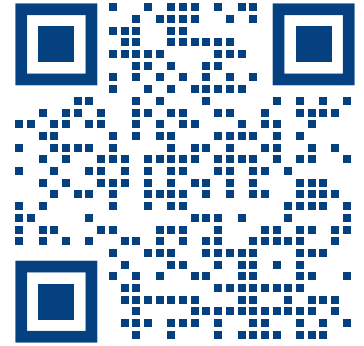
MS A53

Hartsville, SC 29550

email: [complianceoffice@sonoco.com](mailto:complianceoffice@sonoco.com)

## Business Conduct Hotline

1. To report online [click here](#).
2. To report through mobile device scan QR code to the right
3. To report by telephone/landline:



Country	Phone Number	Languages
United States / Canada	844-705-9179	English and Spanish
Brazil	0800 724 8369	Portuguese and English
China	400 120 4128	Mandarin, Cantonese and English
Germany	0800 1818959	German and English
Indonesia	007-803-321-2111	Indonesian and English
Malaysia	1-800-81-3809	Malay and English
Mexico	800 681 6923	Spanish and English
Poland	0-0-800-141-0319	Polish and English
United Kingdom	0800 069 8772	English and Spanish
France	0805 11 2551	French and English
Italy	800725930	Italian and English
All other locations (Request the local telephone operator to place a reverse-charge call to the United States)	1-770-729-7057	English

**All options provide anonymity. This reporting service is available 24 hours a day, seven days a week.**

# Retaliation

Any Sonoco employee who, in good faith, raises an issue regarding a possible violation of law or Company policy will be protected from retaliation. It is a violation of Sonoco's policies on business conduct for anyone to be harassed for raising a concern regarding a known or suspected violation. Anyone who is found to have retaliated against an employee, officer, or director for that individual having raised an issue in good faith pursuant to these policies on business conduct will be subject to discipline, up to and including termination of employment. Employees who feel they are being retaliated against should immediately contact the Legal & Compliance Office.

# Waivers

Any waiver of the Company's Policies on Business Conduct for a director or executive officer of the Company may be made only by the Board of Directors of the Company. The reasons for any such waiver shall be documented in the minutes of the meeting of the Board of Directors at which it is considered and granted. Any such waiver shall be promptly disclosed to shareholders of the Company.

# Additional Resources

The following resources are also available:

## **Sonoco's electronic document library**

Many of the Company's manuals and policies are located on the internal SIMON portal at: [US Corporate Policies Table of Content](#).

## **Business Ethics Website**

To access Sonoco's business ethics documents, visit the Company's Investor Relations site for: [Documents & Charters](#).