



# Policies on Business Conduct

October 2020

September 2020

**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, call Sonoco's Business Conduct Hotline (844 705 9179) or contact the Company's legal counsel. (See page 11 of the manual).

Sonoco's reputation is our most valuable 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

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## Who is Responsible for Following Our Code?

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, the laws and regulations in the United States, as well as in the many other countries where we do business, have become increasingly complex, and interpretation of the applicability of these laws and regulations to specific situations is often confusing. Therefore, our Business Conduct policy does not stop at simple legal compliance. Even where the law is permissive, our Company chooses the course of highest integrity. Local customs 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 of 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 apply 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 provide 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, we expect you to use good judgment and to seek advice from supervisors and management. If you still have doubts or questions, you should contact our legal counsel for advice. (See page 13 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 14.

Our policies on business conduct are intended to set out 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.

## 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

In addition to our workplace, safety should be practiced at home, when visiting family and friends, while traveling and when on vacation.

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.

## 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.

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. Sonoco is committed to providing equal opportunity in all of 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.

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 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, higher management, or their designated Human Resources Department contacts. Complaints may also be made through the Business Conduct Hotline. All complaints will be promptly and thoroughly investigated.

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

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 or Human Resources Department contact.

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, via the Workday portal.

Sonoco supports and respects the protection of international human rights and supports the elimination of all forms of forced, bonded or compulsory labor and all forms of exploitation of child labor. The Company tries to ensure fair treatment for all employees in its operations and within its sphere of influence.

### **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
- Using, 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.

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. Employees should exercise reasonable diligence to choose suppliers who meet these same standards.

Read [Sonoco's Human Rights Policy](http://www.sonoco.com/aboutus/doingbusinesswithsonoco/humanrights.aspx): ([www.sonoco.com/aboutus/doingbusinesswithsonoco/humanrights.aspx](http://www.sonoco.com/aboutus/doingbusinesswithsonoco/humanrights.aspx)) and direct any questions to the Human Resources manager at your location.

## 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 his/her interests ahead of those of the Company.

### Things to consider

Employees, officers and directors must avoid situations where their actions create, or appear to create, a 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 Regional VP HR approval. Any such policy will require Corporate HR and Legal 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 10.

### **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.

## **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, trademarks, 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**

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 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 him/her—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.

## **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.

## 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 transactions involving stocks or bonds of the Company or those business partners about whom they have information until such information has been disclosed 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 general counsel as shown on page 11.

## 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 as long as it does not interfere with work. 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 (Twitter, Facebook, 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

Company electronic communications are not private. Anything sent or received via Company communications is subject to review by authorized Company officials. The communications systems, all messages and their content 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: <https://bit.ly/3kOQQUu>.

## 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*:

<https://investor.sonoco.com/corporate-governance/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 counsel;

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 counsel 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 counsel if you have concerns about any Company trade activity.

## Illegal Payments to Government Officials

Sonoco has an Anti-Bribery 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 and Foreign Corrupt Practices Act Policy*. Any questions or concerns regarding proper business conduct, or reports of policy violations, should be directed to your supervisor, Company counsel, or the Business Conduct Hotline. Retaliatory action against any employee for reporting such concerns will not be tolerated.

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 securing their influence to obtain or retain business for the Company. The term "foreign official" is broadly defined in the FCPA. It means any officer or employee of a non-U.S. government or of any department, agency, or instrumentality thereof, or of a designated public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization. Public international organizations, for purposes of the FCPA, are designated from time to time by Executive Order of the President of the United States. The current list includes the United Nations, the World Bank, the International Monetary Fund, the International Red Cross, the World Trade Organization, and many other organizations.

Foreign officials include employees and representatives of non-U.S. government departments or agencies, whether in the executive, legislative, or judicial branch of a government, and whether at the national, state, or local level. 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 in an attempt 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 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 except in rare circumstances. Any proposal to make a facilitating payment must be endorsed by the Law Department in advance, and the Law Department endorsement 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 Law Department, or through the Business Conduct Hotline as soon as possible.

Both facilitating and extortion payments, regardless of amount, must be properly recorded in the Company's books and records.

Company guidelines about giving and receiving gifts (see Conflicts of Interest, page 4) apply in every country where Sonoco does business.

If you have questions about a particular type of payment, please contact Sonoco's general counsel as shown on page 13.

## 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 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-the-books funds or assets for any purpose.

## 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 Company legal counsel.

## Media Contact

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 transmit by fax 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.

## 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. You may report violations in several ways:

- Tell your supervisor
- Send a written report to the Company's counsel
- Contact 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**

**Company counsel:**

John M. Florence  
 1 North Second Street  
 Hartsville, SC 29550  
 email: [john.florence@sonoco.com](mailto:john.florence@sonoco.com)

**Business Conduct Hotline**

**1.** To connect by telephone, call the number below that corresponds to your location:

All other locations +1 770 810 1147  
*(Request that the local telephone operator place a reverse-charge call to the United States)*

**2.** To connect through the internet, visit [www.sonoco.ethicspoint.com](http://www.sonoco.ethicspoint.com) and submit a report electronically.

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

Country	Line Type	Hotline Number	Language Option #1	Language Option #2	Language Option #3
United States	US Dialing Plan	844-705-9179	English	Spanish (LA)	
Brazil	One-Connect	0800-724-8369	Portuguese (BR)	English	
China	One-Connect	400-120-4128	Mandarin	Cantonese	English
Germany	One-Connect	0800-1818959	German	English	
Indonesia	One-Connect	007-803-321-2111	Indonesian	English	
Malaysia	One-Connect	1-800-81-3809	Malay	English	
Mexico	One-Connect	800-681-6923	Spanish (LA)	English	
Poland	One-Connect	0-0-800-141-0319	Polish	English	
United Kingdom & Northern Ireland	One-Connect	0800-069-8772	English		



## 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 contacting the Business Conduct Hotline or Sonoco's legal counsel regarding a suspected violation. Employees who feel they are being retaliated against should immediately contact legal counsel.

## Waivers

Any waiver of the Company's *Setting the Standard: 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: <https://bit.ly/3kHoWd7>.

### **Business Ethics Website**

To access Sonoco's business ethics documents, visit the Company's Investor Relations site at: <https://investor.sonoco.com/corporate-governance/documents-charters>.