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**The Greif Way – Greif’s values are the same, wherever we are in the world.**

**Purpose:** Greif is committed to conducting business with the highest standards of integrity and respect and in a legal, ethical and socially responsible manner. This Supplier Code of Conduct is based on this commitment and reflects our role as a participant in and active supporter of the fundamental principles set forth in the U.N. Global Compact. This Supplier Code of Conduct outlines Greif’s business conduct expectations for our suppliers, their agents and subcontractors (collectively, “Suppliers”) under four pillars: Ethics; Health and Safety; Human Rights and Labor; and Environment and Sustainability.

**Compliance with Laws:** In addition to any specific references set forth in this Supplier Code of Conduct, our Suppliers are required to comply with all applicable national and local laws, rules, regulations and requirements. In addition, Suppliers are required to maintain and comply with licenses and permits as required and appropriate based on industry, geography and facility.

## ETHICS

*Adhere to the highest standards of ethical conduct.*

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- **Bribery and Corruption**

All forms of corruption, extortion, fraud, bribery and embezzlement are strictly prohibited, whether active or passive. Never directly or through intermediaries, pay or accept bribes or participate in other illegal conduct. Do not violate any applicable anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices and the UK Bribery Acts and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business.

- **Conflicts of Interest**

Decline to enter into transactions that create a conflict of interest and report any situations that may appear as a conflict of interest.

- **Fair Competition**

Conduct business with fair and vigorous competition and eliminate anti-competitive practices and behaviors. Comply with all antitrust/competition laws.

- **Confidential Information and Property**

Take appropriate steps to safeguard and protect intellectual property rights. Maintain confidential and proprietary information and use such information only for the purpose authorized. Comply with all information protection and data privacy laws and regulations.

- **Records and Money Laundering**

Manage finances in a responsible manner, keeping accurate and transparent accounting and business records. Comply with all relevant reporting requirements and prevailing industry practices. Do not participate in money laundering.

- **Reporting Mechanisms**

Establish a process for reporting employee concerns within the Supplier organization on a confidential and anonymous basis (where permitted by law), without fear of retaliation or harassment. Supplier is expected to conduct proper investigations and take corrective action when needed.

## HEALTH & SAFETY

*Provide a safe and healthy work environment.*

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- **Safety Standards**

Maintain safe, clean and healthy work environments. Implement procedures and safeguards to prevent accidents and injuries to workers, including proper equipment maintenance and safety training. Provide personal protective equipment.

- **Emergency Preparedness**

Prepare for emergency situations in the workplace and develop emergency evacuation procedures.

- **Product Quality and Safety**

All products and services delivered must meet the quality and safety standards required by applicable law.

- **Safety Improvements**

Make continuous efforts to eliminate workplace injuries and illnesses by improving safety practices and avoiding unnecessary risk to employees.

# HUMAN RIGHTS & LABOR

*Uphold human rights and treat all with dignity and respect.*

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- **Human Rights**

Support and respect the protection of all internationally proclaimed human rights and ensure others are not complicit in human rights abuses.

- **Fair and Equal Treatment for All**

Follow employment practices that are consistent with applicable law. Establish work environments free from verbal, physical or sexual harassment and threatening or abusive behavior. Do not discriminate in recruitment, promotion, retention or remuneration on any basis prohibited by law (including for example race, religion, age, gender, color, sex, sexual orientation, national or ethnic origin, disability and veteran status).

- **Diversity and Inclusion**

Embrace and support diversity of culture, language, location, and thought and access to equal opportunity.

- **Freedom of Association**

Respect the right of freedom of association, the right to join work councils and engage in collective bargaining, subject to, or in accordance with, all applicable laws and regulations.

- **No Child Labor**

Only employ children in accordance with the principles of the relevant ILO's Conventions (No. 138 and No. 182), and in any event not before the age of fifteen.

- **Wage and Benefits**

Provide timely and fair compensation according to applicable wage laws and regulations including minimum wage, permitted deductions, overtime hours, maximum working hours, rest days, acceptable living conditions and other mandated benefits.

- **No Involuntary Labor**

Using or benefiting from forced labor, whether in the form of compulsory labor, trafficked labor or other forms of coercion in the supply chain or business operations as defined in relevant ILO Conventions (No. 29 and No. 105) is strictly prohibited.

- **Indigenous Communities**

Respect the principle of free, prior, and informed consent (FPIC) concerning the natural resources and land rights of indigenous communities.

# ENVIRONMENT & SUSTAINABILITY

*Conduct business in a manner to preserve and protect the environment.*

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- **Environmental Laws**

Comply with all applicable environmental regulations, permits, licenses and reporting requirements.

- **Sustainability**

Use financial, natural and human resources wisely and without compromising the ability of future generations to meet their needs through sustainable best practices. Adopt environmental management best practices to reduce environmental impact of business operations and protect and preserve nature and biodiversity.

- **Ethical Procurement**

Procure raw materials including conflict minerals (tin, tantalum, tungsten and gold) in an ethical manner that supports sustainable business practices.

- **Waste and Emissions**

Engage in the process of continuous improvement to minimize waste and water consumption, reduce greenhouse gas emissions and energy usage and prevent pollution. Restrict the use of hazardous materials and chemicals and reduce hazardous air emissions.

**Application of this Supplier Code of Conduct:** These standards are in addition to, and not in lieu of, provisions of any express or implied agreement between the Supplier and Greif. Each Supplier is expected to adopt an approach of continuous improvement in all aspects of its business. Greif recognizes that reaching the standards established in this Supplier Code of Conduct is a dynamic process and encourages each Supplier to continuously improve their operations. Whether a Supplier meets the above expectations, may affect Greif's decision to enter into or continue a business relationship.

**Reporting Violations and Concerns:** Anyone who becomes aware of or suspects a violation of any law, regulation or this Supplier Code of Conduct by a Greif representative or a supplier has a responsibility to take action without delay. Reports may be submitted in a confidential and anonymous manner (where permitted by law) through Greif's Ethics Hotline. Submit a written report anytime at [www.greif.ethicspoint.com](http://www.greif.ethicspoint.com) or in North America call 866-834-1825. To call from outside North America (where available), go to [www.greif.ethicspoint.com](http://www.greif.ethicspoint.com) and select the appropriate country under "To Make a Report" to locate the toll-free number.