



# CODE OF BUSINESS CONDUCT

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## A message from our CEO



Today's business environment is complex and always evolving. One constant, however, is Dart Container's good reputation depends on our employees thoughtfully applying our company Values and Code of Business Conduct in business situations.

We are proud to share our Values and this Code with our customers, suppliers and communities where we have operations, so you know the high standards to which everyone at Dart holds themselves and each other.

I believe the quality of our people and our commitment to our Values and Code of Conduct assures our business and community partners that Dart Container Corporation is a highly ethical organization you can trust as an employer and supplier.

Sincerely,

Keith Clark

CEO, Dart Container Corporation



We take pride in operating our business with honesty and integrity. Our employees understand they must challenge themselves every day to make sure their choices stand the test of time for all of us at Dart.

As individuals, having personal integrity means we can trust and respect our Dart coworkers and know they will be honest, fair and forthright. As a company, having integrity means we will always honor our commitments and be a reliable business partner and trusted member of the community. Integrity protects Dart's reputation and helps us thrive, even in today's complex and competitive business environment.

#### **ABOUT THIS CODE**

Dart Values are the foundation of our success and will continue to define what is unique about Dart. In addition to our Values, we have developed this Code of Business Conduct ("Code"), which is a high-level summary of our standards and expectations.

This Code doesn't address all questions or anticipate every situation that might arise. It is intended to be used in conjunction with additional resources Dart Container makes available to our employees, subsidiaries and affiliated companies (collectively referred to throughout the Code as "Dart" or "company"). These additional resources are listed throughout the following pages, where appropriate.

#### **APPLYING THIS CODE**

This Code applies to all Dart employees.

Certain vendors (suppliers, contractors, consultants, etc.) and agency temporary workers serve as an extension of our business and their conduct can impact Dart's reputation. For the purposes of this Code, we will collectively refer to this group as "business partners." Those in a position to supervise our business partners are responsible for ensuring they understand Dart's ethics and compliance standards. We expect all our business partners to act in a way that is consistent with our Code when working on our behalf. Dart may take appropriate measures if a business partner fails to meet applicable standards within our Code or their contractual obligations.

#### **EMPLOYEE RESPONSIBILITIES**

At times, our employees may face difficult situations at work that test their values and judgment. While such situations may be rare, even routine decisions can impact Dart's reputation. That is why each of our employees must:

- · Always act in a professional and ethical manner.
- · Be aware that their behavior reflects on the company.
- Be familiar with and follow the guidelines in this Code as well as applicable laws and policies – paying particular attention to policies pertaining to their job responsibilities.
- Ask questions when they are in doubt about what to do or when they need help making a decision.
- Promptly report any suspected illegal or unethical behavior.

- Fully cooperate when responding to an investigation or audit.
- Understand that pressure or demands due to business conditions are never an excuse for violating the law or this Code.

## RESPONSIBILITIES OF DART MANAGERS AND SUPERVISORS

In addition to the core responsibilities of managing themselves, developing their teams and advancing the business, Dart managers have additional responsibilities to ensure the company meets our high standards of ethics and compliance. We expect all managers and supervisors – regardless of level – to meet the following additional responsibilities:

- Promote awareness of the Code with all who report to them, and make sure employees receive appropriate guidance on the Code and company policies that affect their job duties.
- Consider Dart Values, the Code and other Dart policies when evaluating an employee's conduct.
- Refrain from applying pressure on others or leading others to believe that bending the rules or cutting corners is acceptable.
- Enforce our standards consistently and hold people accountable for their behavior at work.
- Set an example by striving at all times to act in accordance with Dart Values.
- Demonstrate the importance of ethics and compliance through their actions.
- Be available for employees who have questions or wish to report a possible violation, and:
  - » Create an environment where individuals feel comfortable speaking up.
  - » Listen and respond to concerns.
  - » Ensure those who speak up do not face retaliation.

#### **ASK BEFORE ACTING**

Every employee has a responsibility to help protect Dart's reputation and integrity. If an employee is faced with a situation where they are uncertain how to respond, they should follow the simple rule of "Ask Before Acting." They are encouraged to ask questions of any individual listed in this section.

If an employee sees or suspects illegal or unethical behavior involving a Dart employee or business partner, they should contact one of the following:

- Any manager at any level, including Dart's Executive Leadership Team (ELT).
- Their Human Resource Office.
- An employment attorney in the Dart Legal Department.
- The Dart Ethics Helpline, accessible on the company intranet.

Employees must report any critical incident (i.e., immediate threats to life or property) by calling 911 and then their location's Dart security personnel to obtain the fastest response.

#### **ANONYMOUS REPORTING**

Employees can anonymously report possible illegal or unethical behavior using Dart's Ethics Helpline. This dedicated line is operated by an independent third-party vendor that enables employees to report a violation or potential violation of Dart Values. The Ethics Helpline is available on Dart's intranet.

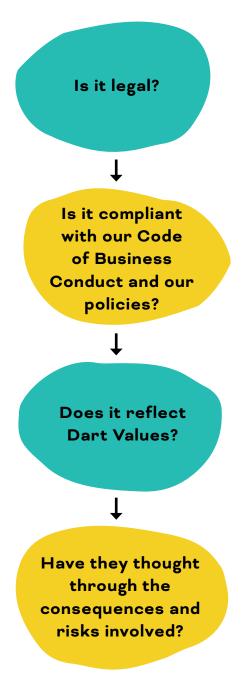
Employees who choose to make an anonymous report are encouraged to clearly describe the situation and provide enough details to permit a meaningful review or investigation. All reports are fully investigated in a timely manner and, if necessary, appropriate action is taken.

We have an opportunity to improve every time a question is asked or a concern is raised. When employees speak up and report questionable conduct, they help us protect the company's reputation.

#### MAKING VALUES-BASED DECISIONS

Making the right decision is not always easy. At times, employees may feel unsure of what to do or pressured to act a certain way. Resources, including those listed in this Code, are available to help Dart employees.

When faced with a difficult decision, employees should ask themselves these questions:



If the answer to any question is "no" or they are uncertain, employees should ask for guidance.

## COMPLIANCE WITH LAWS AND COOPERATING WITH INVESTIGATIONS

Dart conducts business in accordance with all applicable laws and regulations, although it is impossible to account for everything in this Code. Consequently, all employees must use good judgment, ask questions when in doubt and always keep up to date on the policies, laws and regulations that apply to their responsibilities.

Employees who have a question about whether a work situation may involve possible illegal conduct or violate specific laws are directed to consult the Dart Legal Department.

#### Employees are expected to:

- Cooperate fully with both internal and external audit teams to ensure a complete, timely and accurate audit process.
- In the event of litigation or regulatory investigations, always refer the matter to the Dart Legal Department.
- If they receive a Dart-related summons, subpoena, inquiry or other communication from any court, government body or agent, or from any lawyer for a private party, they are not to respond until they have spoken with someone in the Dart Legal Department.

#### **NON-RETALIATION POLICY**

Dart prohibits retaliation against any individual who, in good faith, reports discrimination or harassment or Employee participates in any investigation. Retaliation against any individual for reporting a claim in good faith or participating in any investigation will subject the retaliator to disciplinary action, up to and including separation.

Employees who believe they or someone they know has suffered retaliation are expected to contact any of the resources listed in this Code.

#### **ACCOUNTABILITY AND DISCIPLINE**

Dart will take appropriate action if a violation of this Code, policies or the law occurs. Such action may include coaching, counseling, suspension without pay or separation from the company. Certain violations may also result in legal action, civil penalties or criminal prosecution.

In addition, any employee who directs, approves or who has knowledge of conduct in violation of this Code and does not report it, is also subject to appropriate action.



Dart values the unique contributions each person brings to Dart. Teamwork and respect are central to how we work, and we believe the best solutions are those that draw on diverse ideas and perspectives. That is why we value each and every employee as an important contributor to our success and aim to create a working environment where everyone has the opportunity to succeed and contribute.

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#### Employees are expected to:

- · Work with others constructively and not be afraid to respectfully challenge others to achieve the best results
- · Help create an environment where others feel comfortable speaking up and contributing.
- · Treat others and their ideas with respect at all times.
- Never discriminate based on race, religion, sex, age, national origin, sexual orientation, gender identity or any
  other bases prohibited by law.
- Make employment-related decisions based on demonstrated abilities and achievement, not on favoritism or nepotism.

#### HARASSMENT-FREE WORKPLACE

Dart knows employees work best when they feel safe. For this reason, Dart does not tolerate any form of abuse or harassment. This includes any action that could be considered offensive, intimidating or a form of sexual harassment. We expect employees to create a work environment free of harassment and intimidating and disrespectful behavior. Dart does not tolerate inappropriate comments and sexually offensive behavior.

At Dart, harassment does not have to occur in the workplace or involve another Dart employee to violate Dart Values or the law. Employees are provide additional information in Dart's Harassment Policy.

#### SAFETY, HEALTH AND WELLBEING

Safety is a top priority at every Dart location and is particularly important in Dart's production and distribution environments. Employees in production and distribution environments must follow significant workplace safety regulations or potentially face serious consequences. Dart established safety guidelines to maintain a safe work environment for all employees and third parties. We designed our safety guidelines to fit the scope of operations and have adopted the following Safety Beliefs:

- · Nothing we do is worth getting hurt.
- · Safety must be managed.
- · Every accident should have been prevented.
- Safety is a lifestyle...it's not just for work.
- · Safety is everyone's responsibility.
- Safe behavior is a condition of employment.

#### Employees are expected to:

 Immediately report all work-related injuries, illnesses, property damage and near misses.

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- Take personal responsibility for their safety and that of their fellow workers.
- Maintain a safe personal workspace.
- Know and comply with all applicable Dart safety policies, rules, procedures and guidelines.
- Discontinue work and shut down any machine or process they suspect to be unsafe.
- Immediately inform a supervisor, manager or safety leader of any safety violation, property damage, unsafe condition or safety concern.

## PRIVACY AND PROTECTING PERSONAL INFORMATION

Everyone at Dart must respect the privacy and confidentiality of personal employee information and only use personal information that is needed to operate effectively or comply with the law.

The company does not wish to intrude on what employees do outside of work – unless it affects their work performance, a coworker's performance, Dart's reputation or our business interests.

#### Employees are expected to:

 Use care and ensure they have appropriate authorization to share personal data about another employee.

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- Only collect, store and use personal data that is absolutely necessary to carry out the business purpose for which the data was collected.
- Make an effort to encrypt electronic messages containing sensitive personal data.
- Consult the Dart Legal Department to identify any legal requirements they must follow when transferring personal information.
- Never share personal information about the Dart family or Dart business matters with anyone at any time without first obtaining appropriate approval.





#### PROTECTING OUR PROPERTY AND ASSETS

Everyone at Dart is responsible for protecting Dart property and assets, including our facilities, equipment, computers and information systems, confidential information, inventory, supplies and funds.

#### Employees are expected to:

Care for and use Dart's property and assets responsibly and protect them from fraud, theft, damage and misuse.

- While they are permitted incidental personal use of Dart assets such as our network, Wi-Fi, computers, telephones and supplies, employees should use such assets very sparingly and NOT:
  - » In a manner that harms the business, the reputation of the Company or any individual associated with the Company.
  - » For downloading, creating, storing or sending any content others might find offensive.
  - » For non-Dart business interests.
- Guard our intellectual property and respect the intellectual property rights of others.
- · Always comply with computer software copyrights and with the terms and conditions of software licenses.
- Ensure funds are properly used for their established purposes.
- Never spend company funds without proper approval, and never enter into an agreement on behalf of any Dart entity unless they are authorized to do so.
- Never intentionally conceal, alter, falsify or omit information for personal benefit or the benefit of others. Doing
  so is a misuse of company resources and may be fraud.

Employees have access to specific guidance pertaining to the use of information technology assets in Dart's Information Technology policies.

#### **USE OF DRUGS AND ALCOHOL**

Employees must report to work free from the influence of alcohol, illegal substances and certain medications that could impair work performance or create an unsafe working environment.

If reasonable suspicion exists that an employee may be under the influence of an illegal substance or traceable alcohol while performing their duties, they may be required to take a drug and/or alcohol test. A positive result could result in appropriate action, including separation.

Employees have access to more information in Dart's Alcohol and Drug Free Workplace Policy.

## **Employees' Responsibilities to Our Customers and Business Partners**

#### **FAIR DEALING**

Employees are expected to:

- Always deal honestly and ethically with our vendors, customers and competitors. They should not misrepresent our services and capabilities.
- Not take unfair advantage through manipulation, concealment and abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice.
- Remember they are the face of Dart in the local community, to our business partners and our customers. Our reputation is an important asset, and employees must remember how easy it is to damage that reputation.

It is crucial our employees use sound judgment at all times during all dealings on behalf of Dart, both during and outside of normal business hours.

#### Employees are expected to:

- · Treat others fairly and honestly.
- Be responsive to requests from our customers and business partners but never follow a request to do something they regard as unlawful or contrary to this Code.
- Never provide others with information they are not authorized to share.
- Promise what they can deliver and deliver on what they promise.
- Not make disparaging remarks about competitors.
   Instead, focus on the merits of our business.

#### **CONFLICTS OF INTEREST**

Dart would consider employees to have a conflict of interest in any situation where they could use or be perceived to use their position as an employee of Dart, or knowledge gained through their employment with Dart, to promote personal interests (e.g., financial gain) that may or may not benefit Dart, or that may impair their ability to make objective business decisions.

Employees may not compete directly or indirectly with

Dart in our business activities. The determination as to whether their conduct results in prohibited competition will rest solely with Dart.

Many of our operations take place in small local communities. This may make it difficult to completely prohibit employees or their relatives from having investments in companies with which we do business. Nevertheless, such business dealings can create conflicts. Favoritism toward relatives or friends should never play any role in business decisions. In some cases, it may be difficult to recognize, but employees should always disclose the situation to their immediate supervisor and/or Human Resources as soon as possible in accordance with the applicable Dart policy.

#### **OTHER EMPLOYMENT**

At times, employees may have secondary employment outside of Dart. They are responsible for ensuring other work does not interfere with or detract from their ability to work safely and effectively at Dart. Working for a competitor, customer or vendor will likely raise conflicts and must be discussed with and approved by management. Employees should not be involved in or have influence over any company decisions affecting a secondary or personal business that competes or does business with Dart.

#### **CORPORATE OPPORTUNITIES**

If employees learn information through their work at Dart that could lead to a business opportunity, they cannot take advantage of the opportunity for their own personal benefit nor should they pass on the information for the benefit of others.

## CIVIC AND COMMUNITY ENGAGEMENT

Employees are encouraged to be involved in civic activities on their own time. However, if they serve on an external board or a civic committee that is considering a decision involving Dart, they should discuss the matter both with their Vice President and with the external board or committee to determine whether the decision would be a conflict of interest.

#### GIFTS AND ENTERTAINMENT

Business gifts and entertainment are courtesies designed to build working relationships and goodwill with vendors, customers and other third parties. However, gifts are not appropriate if they create or appear to create an obligation, put employees in a situation where they appear to be biased or are given with the intent to influence a business decision.

- Employees and their immediate family must not offer, give, solicit or receive gifts, money, services or anything else of value from or to a third party when doing so may influence, or be perceived as influencing, a decision or action.
- With some important exceptions, receiving gifts
  of nominal value is permitted. Examples include
  modest occasional business meals or occasional
  attendance at sporting, theater and other cultural
  events.
- Giving or receiving gifts from a government official is particularly sensitive. As such, employees must consult with the Dart Legal Department to receive guidance on whether it is appropriate.
- If an employee is offered a gift they believe to be excessive but inappropriate to decline, they may accept it and turn it over immediately to the Dart Legal Department for acceptance on behalf of the company.
- Employees should receive any gifts (including meals and entertainment) openly and ensure they are accurately documented per the Dart Conflict of Interest policy. They should never accept any gift that might put the reputation of Dart at risk if publicly disclosed.

Employees may refer to the Dart Conflict of Interest Policy for full details on gifts and entertainment, including disclosure procedures.

#### **VENDOR RELATIONS**

Our vendors – including contractors and subcontractors – can make significant contributions to Dart's success. To create an environment where they have an incentive to continue to work with us, they must be confident we will treat them as required by law and in an ethical manner.

Our policy is to select vendors based on need, quality, service, price and appropriately negotiated terms and conditions. We select vendors through a competitive bid process and, whenever possible, define vendor relationships through written contracts.

We strive to do business only with vendors and business partners who demonstrate high standards of ethical business behavior and who understand and meet standards within our Code that are applicable to their work with Dart, as well as any other contractual obligations.

#### Employees are expected to:

 Help our vendors and business partners understand our expectations and act in a way that is consistent with our Code and applicable policies.

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 Report any suspicions that a business partner may not be meeting our standards or their contractual obligations.



#### CONFIDENTIAL INFORMATION

In the course of their work, employees may have access to confidential or proprietary information about Dart, our customers or other third parties. Employees are to be vigilant to safeguard our confidential information as well as confidential information that is entrusted to them by others. They must comply with Dart's corporate Confidentiality Agreement as well as any confidentiality agreement or code of conduct acknowledgment they have executed during their employment.

Much of Dart's intellectual property is protected as trade secrets. Employees must keep this confidential information secure, limit access only to those who need to know and use it only for permitted purposes. Their obligation to preserve confidential information is ongoing, even after their employment ends. They also must not knowingly persuade other people to breach confidentiality obligations to third parties.

Employees must respect all intellectual property, patents, trademarks, copyrights, proprietary information and trade secrets, as well as the confidentiality of anyone with whom we do business.

Confidential information includes, but is not limited to:

- Manufacturing methods, processes, plant layout and design.
- Product designs, composition or specifications (failed, in progress, in use or archived).
- · Financial information, including annual sales.
- · Customer lists and account data.
- · Proposed products or processes.
- Identity of sources for materials or development and technical services.
- Sales and marketing data.
- Business plans, strategies, practices and processes.
- Identities of existing and potential suppliers and vendors used in the production, distribution or sale of Dart products.
- Details about ownership and corporate structure.
- · Personal information about the Dart family.

- Employee files, compensation data and other employee personal information.
- Business, financial, marketing and strategic plans.
- Identity and contract terms with service providers.
- Information technology, operations, research and technical data.
- Third-party information and records given to us in confidence.
- Non-public information (including that of customers) gained through work.

#### Employees are expected to:

 Maintain confidential information in an appropriate and secure manner and clearly label all confidential information.

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- Ask if they are unsure about whether or not information is confidential.
- Share intellectual property and confidential information only with authorized parties.
- Not remove confidential documents from Dart premises unless absolutely necessary.
- Use a non-disclosure or confidentiality agreement approved by the Dart Legal Department when sharing information outside Dart.
- Never discuss confidential information in public or in the presence of unauthorized employees.
- Immediately report the loss or misplacement of any protected information.
- Dispose of confidential material securely.
- Take care when accepting information from third parties. Know and trust their sources, and be sure the knowledge they provide is not protected by trade secret laws or non-disclosure or confidentiality agreements.
- Recognize and respect the valid legal obligations of any employees hired from former competitors, and do not encourage them to disclose the confidential information of their former employers.



#### **INSIDER TRADING**

Employees may become aware of material non-public information about publicly traded companies. Using this information for personal gain (including for trading purposes), sharing it with others or spreading false rumors is illegal and is a violation of this Code.

Information is material if it's likely an investor would want to know or benefit from having that information ahead of making an investment decision or, if disclosed, would have an impact on the pricing of a security.

Information is **non-public** if it has not been released broadly to the market (i.e., through widely disseminated company communications or press releases.)

#### Employees are expected to:

- Never buy or sell securities if they are in possession of material non-public information.
- Not pass on material non-public information or "tips" to others.
- Use care when trading, even if they think they aren't in possession of material non-public information.
- Consult with the Dart Legal Department If they encounter information they intend to act on or share with others and the information could be considered to be material and non-public.

## CREATING AND MAINTAINING BUSINESS RECORDS

Employees contribute to the process of recording financial and non-financial information.

Business partners, government officials and others rely on our accurate and complete disclosures and business records. Such information is also essential within Dart so employees can make good decisions.

#### Employees are expected to:

- Help maintain Dart's books, records, accounts and financial statements in reasonable detail to appropriately reflect the transactions and conform both to applicable legal requirements and to Dart's system of internal controls.
- Never make false, misleading, incomplete or dishonest entries about our business and performance – good or bad.
- Avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that could lead to misunderstandings. This applies equally to email, internal memos and formal reports.



## CORPORATE SOCIAL RESPONSIBILITY AND COMMUNITY ENGAGEMENT

Dart wants the communities where we live, work and do business to recognize us as a trusted neighbor. We take pride in the value of our contributions – in the form of products and sponsorships – and believe maintaining an open, ethical stance will continue to make a positive difference.

- Employees who participate in community, nonprofit or government organizations must be aware of the potential for the appearance of conflicts of interest. They must disclose their involvement and discuss any concerns with their immediate supervisor.
- When participating in outside organizations, they
  must not use Dart email or letterhead and should
  take care to ensure their expressed opinions are
  understood to be personal views and not those of
  Dart, unless they have been authorized to express
  an opinion on behalf of Dart.
- Dart's Corporate Communications Department will review any requests for Dart to promote or sponsor a charitable activity. If approved, employees aren't required to participate.

#### **ENVIRONMENTAL STEWARDSHIP**

Dart has, and continues to be, our industry's leader in promoting the positive environmental attributes of

our products and supporting the recycling of food and beverage packaging. We take great pride in the many initiatives we have undertaken to educate our customers, employees and the public about the recyclability of foodservice items and provide them with opportunities to recycle where possible. It is Dart's policy to ensure the environmental integrity of our processes, equipment and facilities at all times. We do so by:

- Employing management systems and procedures specifically designed to minimize Dart's environmental impact, reduce waste, increase energy efficiency and prevent pollution.
- Continually identifying, establishing and refining environmental performance goals to ensure constant improvement.
- Communicating to our customers, employees and communities about our commitment to responsible environmental management and promoting environmental responsibility.
- Complying with all applicable laws, rules, regulations and other requirements which apply to Dart and are related to environmental protection and stewardship.

## COMMUNICATING WITH THE PUBLIC/MEDIA

Employees are not permitted to speak on behalf of the Company unless authorized and should never speak on behalf of one of our customers or suppliers. Employees must refer all outside requests for information, regardless of the medium in which it was received (e.g., social media, email, telephone) to the Corporate Communications Department at dart.communications@dart.biz.

Additionally, employees are prohibited from improperly disseminating confidential, false or damaging information about a Dart customer through any form of media, including social media.

## POLITICAL AND SOCIAL ACTIVITIES AND GOVERNMENT RELATIONS

Dart proudly participates in local economic and community activities. This sometimes requires us to have constructive and candid communications with various sectors of the community, including governmental authorities and a variety of special interest groups. This community activity requires employees to exercise care so:

- They accurately communicate Dart's position(s).
- Their individual views are not confused with Dart's positions.
- Dart's activities are ethical and lawful, and we avoid even the perception of wrongdoing or conflicts of interest.
- Dart complies fully with all applicable laws and regulations that apply to government contracting and transactions.

Dart supports the principle that employees have the right to participate in politics and be involved in civic, charitable and environmental organizations and events, either within groups or individually. In doing so, employees must clearly distinguish between their personal views and actions and those of Dart. However, politics, like religion, can stir strong emotions, thus leading to potential issues if discussed in the workplace. Problematic issues include:

- Political conversations among coworkers that lead to heated discussions.
- Employee perceptions that a supervisor/manager or HR staff member is promoting a specific candidate or cause.

Effectively managing these issues can make the difference between a productive and non-productive work environment. The key to managing the issue is to ensure all employees are treated with respect by each other and their supervisors, managers and HR staff. While we do not prohibit political conversations in the workplace, we expect employees to treat one another with respect. Clearly, we cannot tolerate conversations and activities that hinder respect and productivity in the workplace.

#### **ANTI-CORRUPTION AND BRIBERY**

Corruption and bribery in all forms are completely contrary to our business standards. We comply with all applicable international laws, treaties and regulations, and it is Dart policy to forbid bribery of both public officials and within the private sector, including the US

Foreign Corrupt Practices Act (FCPA).

#### Employees are expected to:

 Not give or accept bribes or kickbacks, offer to facilitate or accept bribes or kickbacks or provide any other kind of improper payment.

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- Keep accurate books and records so payments can be honestly described and company funds aren't used for unlawful purposes.
- Adhere to our anti-corruption and bribery standards when selecting third parties that provide services on behalf of Dart. Employees should monitor their behavior and should never "look the other way."
- Contact the Dart Legal and/or Dart Internal Audit departments if they have concerns or questions about bribes or improper payments.
- Not do anything through a third party that we aren't allowed to do ourselves.
- Be aware that not reporting a bribe or other illegal activity may in itself be an offense.

Employees can face severe consequences if they or one of our business partners violate anti-bribery laws. Even the perception by others that an employee may have acted illegally can be damaging. For this reason, our employees must always be aware of how their actions might be viewed by others, and speak up and ask questions if they are unsure, particularly when conducting business in foreign countries.

## LEGAL AND SOCIAL ACCOUNTABILITY

Dart's policy is to respect human rights and to comply with all local and national laws wherever Dart conducts business, to uphold a high standard of ethics, and to cooperate with reasonable requests for information by government entities or agencies. Dart is committed to adhering to the Ethical Trading Initiative base code and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. These regulations cover forced labor, child labor, employee health and safety, freedom of association, compensation, working hours, discrimination and harsh or inhumane treatment.

Dart requires its suppliers to adhere to these regulations as well. They must conform to all pertinent local and national legal requirements, customs and published industry standards pertaining to employment and manufacturing.



#### **GLOBAL TRADE**

We honor all trade, import, customs and export laws in the countries in which we operate. If there is a conflict, or if an employee is not sure what laws apply, they are to consult the Dart Legal and/or Dart Logistics departments.

- Some countries impose trade restrictions or boycotts covering specified countries, entities and individuals. Employees should consult with the Dart Legal Department immediately if they are asked to deal with a sanctioned or restricted country, entity or individual.
- Import and export restrictions often change. If an employee is involved in import and export, they must make sure they are up to date on relevant rules.
- Employees should seek advice when transferring data or technology across borders or to individuals from sanctioned countries.
- Goods should not be imported or exported outside
  of established business processes. For example,
  if an employee is on a trip and purchases or
  receives goods related to the business, they are not
  permitted to bring these items into the country as
  part of their personal customs declaration.
- If an employee is subject to any obligations
  resulting from cross-border travel, including
  immigration, payroll and personal tax
  requirements, they are responsible for complying
  and, where necessary, seeking assistance from the
  Dart Legal Department.

#### IN CLOSING

Our Code of Business Conduct makes clear how everyone at Dart is responsible for understanding and following all applicable laws and regulations and to comply with company standards and policies.