

CODE OF BUSINESS CONDUCT

A message from our CEO



Today's business environment is complex and continually evolving. One constant, however, is that 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 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

As of September 17, 2026, this is the only version of

the Code of Business Conduct

which will be maintained and applied.

No prior version of the Code will be maintained

or applied to any employee.



Our Commitment to Honesty and Integrity

We take pride in operating our business with honesty and integrity. We understand we must always challenge ourselves every day to make sure, as a company and as individuals, we make choices that will stand the test of time and of which we can be proud.

As individuals, having personal integrity means others can trust and respect us and know we 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 our reputation and enables us to 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 our organization. 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.

We did not design this Code to address all questions or anticipate every situation that might arise. It is intended to be used in conjunction with additional resources made available by Dart Container and our 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.

FOLLOWING 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 our reputation. For the purposes of this Code, we will collectively refer to this group as "business partners." If you are in a position to supervise our business partners, you are responsible for ensuring they understand our 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. We may take appropriate measures if a business partner fails to meet applicable standards within our Code or their contractual obligations.

RESPONSIBILITIES

At times, you may face difficult situations at work that test your values and judgment. While such situations may be rare, even routine decisions can affect Dart's reputation. That is why each of us must clearly understand our ethical responsibilities and keep the following in mind:

- Always act in a professional and ethical manner. Be aware that your behavior reflects on the Company.
- Be familiar with and follow the guidelines in this Code as well as applicable laws and policies. Pay particular attention to policies that pertain to your job responsibilities.
- Ask questions when you are in doubt about what to do or 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 yourself, developing your 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 you, and make sure they 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 your 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

Each of us has a responsibility to help protect Dart's reputation and integrity. If you are faced with a situation where you are uncertain how to respond, follow the simple rule of "Ask Before Acting." You are encouraged to ask questions of any individual listed in this section.

If you see or suspect illegal or unethical behavior involving a Dart employee or business partner, contact one of the following:

- Any manager at any level, including Dart's Executive Leadership Team (ELT).
- Your Human Resources Business Partner, manager or generalist.
- An employment attorney in the Dart Legal Department at (800) 545-3278.
- The Dart Ethics Helpline, accessible on DartCentral or at (800) 461-9330 or on the web at www.dartcontainer.com/ethicshelpline.

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

ANONYMOUS REPORTING

Dart provides a mechanism for you to anonymously report possible illegal or unethical behavior – the Ethics Helpline. This dedicated line is operated by an independent third-party vendor that enables anyone to report a violation or potential violation of Dart Values. The Ethics Helpline is available toll-free at (800) 461-9330 in the US. Contact numbers for non-US Dart locations are available on DartCentral, which also accepts online reports.

If you choose to make an anonymous report, it is important you 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.

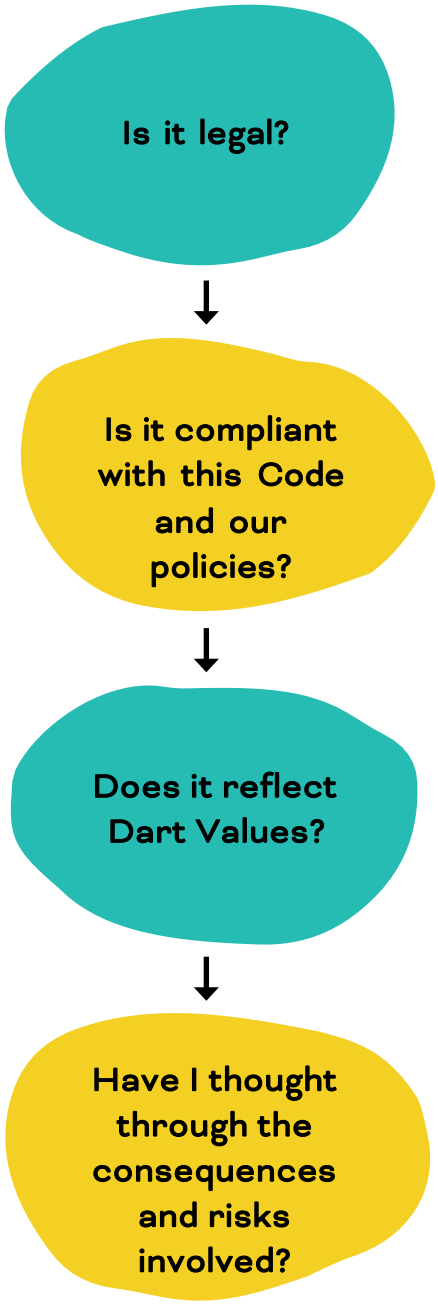
We have an opportunity to improve every time a question is asked or a concern is raised. When you speak up and report questionable conduct, you help us protect the Company's reputation.

For guidance regarding the use of the Ethics Helpline, please refer to DartCentral.

MAKING VALUES-BASED DECISIONS

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

When faced with a difficult decision, ask yourself these questions:



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

COMPLIANCE WITH LAWS AND COOPERATING WITH INVESTIGATIONS

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

If you have a question about whether a work situation may involve possible illegal conduct or violate specific laws, consult the Dart Legal Department.

Always keep in mind

- 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.

OUR NON-RETALIATION POLICY

Dart prohibits retaliation against any individual who, in good faith, reports discrimination or harassment or 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 termination.

If you believe you or someone you know has suffered retaliation, contact any of the resources listed in the "Ask Before Acting" section of this Code.

ACCOUNTABILITY AND DISCIPLINE

Dart will take appropriate disciplinary action if a violation of this Code, policies or the law occurs. Such action may include counseling, verbal or written warnings, suspension without pay or termination of employment. Certain violations may also result in legal action, civil penalties or criminal prosecution by the relevant authorities.

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



Our Responsibilities to One Another

RESPECT AND FAIR TREATMENT

We value 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.

Always keep in mind

- **Work with others constructively. Don't 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.**

SAFETY, HEALTH AND WELL-BEING

Safety is essential for all. Safety is a top priority at every Dart location and is particularly important in our 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.

Always keep in mind

- Immediately report all work-related injuries, illnesses, property damage and near misses.
- Take personal responsibility for your safety and that of your 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 you 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

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

Always keep in mind

- Make an effort to encrypt electronic messages containing sensitive personal data.





PROTECTING OUR PROPERTY AND ASSETS

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

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

Always keep in mind

- **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. Similarly, never enter into an agreement on behalf of any Dart entity unless you 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.**

For specific guidance pertaining to the use of information technology assets, please refer to Dart's Information Technology policies.

USE OF DRUGS AND ALCOHOL

You and your coworkers 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 his/her duties, he or she may be required to take a drug and/or alcohol test. A positive result could result in disciplinary action, including termination.

For more information, review Dart's Alcohol and Drug Free Workplace Policy.



Our Responsibilities to Our Customers and Business Partners

FAIR DEALING

Always deal honestly and ethically with our vendors, customers and competitors. Never misrepresent our services and capabilities and never make promises the Company can't keep.

Do not take unfair advantage through manipulation, concealment and abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice.

We are the face of Dart in the local community, to our business partners and our customers. Our reputation is an important asset, and we must remember how easy it is to damage that reputation.

It is critical that you use sound judgment at all times during all dealings on behalf of Dart, both during and outside of normal business hours.

Always keep in mind

- Treat others fairly and honestly.
- Be responsive to all requests from our customers and business partners but never follow a request to do something you regard as unlawful or contrary to this Code.
- Promise what you can deliver and deliver on what you promise.
- Don't make disparaging remarks about competitors. Instead, focus on the merits of our business.

CONFLICTS OF INTEREST

As an employee, you may not compete directly or indirectly with Dart in our business activities. The determination as to whether your 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 you or your 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 the situation should always be disclosed to your immediate supervisor and/or Human Resources as soon as possible and reported in accordance with the applicable Dart policy.

OTHER EMPLOYMENT

At times, you may have secondary employment outside of Dart. You are responsible for ensuring other work does not interfere with or detract from your 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. Also, in all cases, you 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 you learn information through your work at Dart that could lead to a business opportunity, you cannot take advantage of the opportunity for your own personal benefit nor should you pass on the information for the benefit of others.

CIVIC AND COMMUNITY ENGAGEMENT

You and coworkers are encouraged to be involved in civic activities on your own time. However, if you serve on an external board or a civic committee that is considering a decision involving Dart, you should discuss the matter both with your Vice President and with the external board or committee to determine whether you would be perceived to be acting independently.

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 you in a situation where you appear to be biased or are given with the intent to influence a business decision.

Always keep in mind

- You and your 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 pens or small promotional items, or modest occasional business meals.
- Giving or receiving gifts from a government official is particularly sensitive. As such, you must consult with the Dart Legal Department to receive guidance on whether it is appropriate or not.
- If you are offered a gift you believe to be excessive but inappropriate to decline, you may accept it and turn it over immediately to the Dart Legal Department for acceptance on behalf of the Company.
- You should receive any gifts (including meals and entertainment) openly and ensure they are accurately documented per the Dart Conflict of Interest policy. You should never accept any gift that might put the reputation of Dart at risk if publicly disclosed.

For the full policy on gifts and entertainment, including disclosure procedures, please refer to the Dart Conflict of Interest policy.

VENDOR RELATIONS

Our vendors – including contractors and subcontractors – can make significant contributions to our 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 us, as well as any other contractual obligations.

Always keep in mind

- Help our vendors and business partners understand our expectations and act in a way that is consistent with our Code and applicable policies.
- Report any suspicions that a business partner may not be meeting our standards or their contractual obligations.



CONFIDENTIAL INFORMATION

You must comply with Dart's corporate Confidentiality Agreement as well as any confidentiality agreement or code of conduct acknowledgment you have executed during your employment.

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

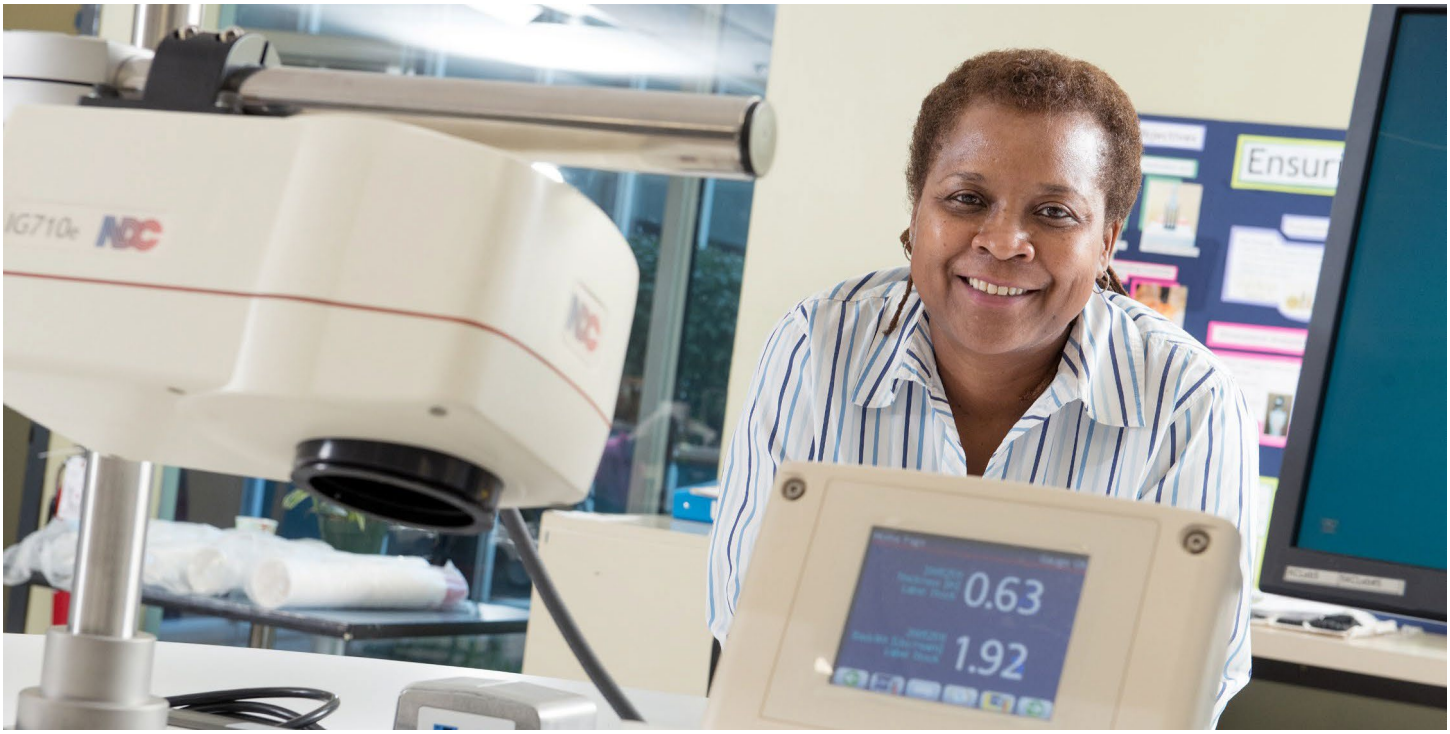
You must respect all intellectual property, patents, trademarks, copyrights, proprietary information and trade secrets, as well as the confidentiality of anyone with whom we do business.

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.
- 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.

Always keep in mind

- Maintain confidential information in an appropriate and secure manner and clearly label all confidential information.
- Since confidential information is not always marked as such, ask your supervisor if you are unsure about whether or not information is confidential.
- Share intellectual property and confidential information only with authorized parties.
- Do not remove confidential documents from Dart premises unless absolutely necessary.
- Use a non-disclosure or confidentiality agreement that has been approved by the Dart Legal Department when sharing information outside Dart.
- Immediately report the loss or misplacement of any protected information.
- Dispose of confidential material in a secure manner.
- 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

In the course of business, you 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 is 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.)

Always keep in mind

- Never buy or sell securities if you are in possession of material non-public information.
- Do not pass on material non-public information or "tips" to others.
- When trading, use care even if you think you are not in possession of material non-public information.
- If you encounter information you intend to act on or share with others and the information could be considered to be material and non-public, you must consult with the Dart Legal Department.

CREATING AND MAINTAINING BUSINESS RECORDS

Each of us contributes 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 we can make good decisions.

Always keep in mind

- Help maintain Dart's books, records, accounts and financial statements in reasonable detail, so they 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.
- As business records and communications may become public, you should 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.



Our Responsibilities as Corporate Citizens

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.

- If you participate in community, non-profit or government organizations, be aware of the potential for the appearance of conflicts of interest. Disclose your involvement and discuss any concerns with your immediate supervisor.
- When participating in outside organizations, do not use Dart email or letterhead and take care to ensure your expressed opinions are understood to be your personal views and not those of Dart, unless you 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 are not 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 do so where possible.

It is Dart's policy to ensure the environmental integrity of our processes, equipment and facilities at all times. We will 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 our commitment to responsible environmental management and promoting environmental responsibility among those same groups using a variety of media to broadly disseminate our commitment.
- Complying with all applicable laws, rules, regulations and other requirements which apply to Dart and are related to environmental protection and stewardship.

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 departments and a variety of special interest groups. This community activity requires you exercise care so:

- You accurately communicate Dart's position.
- Your individual views are not confused with Dart's positions.
- Our activities are ethical and lawful, and we avoid even the perception of wrongdoing and conflicts of interest.
- We comply fully with all applicable laws and regulations that apply to government contracting and transactions when conducting business with governments and government-owned entities.

Dart supports the principle that you 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, you must clearly distinguish between your personal views and actions and those of Dart.

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 you and all employees are treated with respect by each other and your supervisors, managers and HR staff. While we do not prohibit political conversations in the workplace, we expect employees to treat one another with respect.

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).

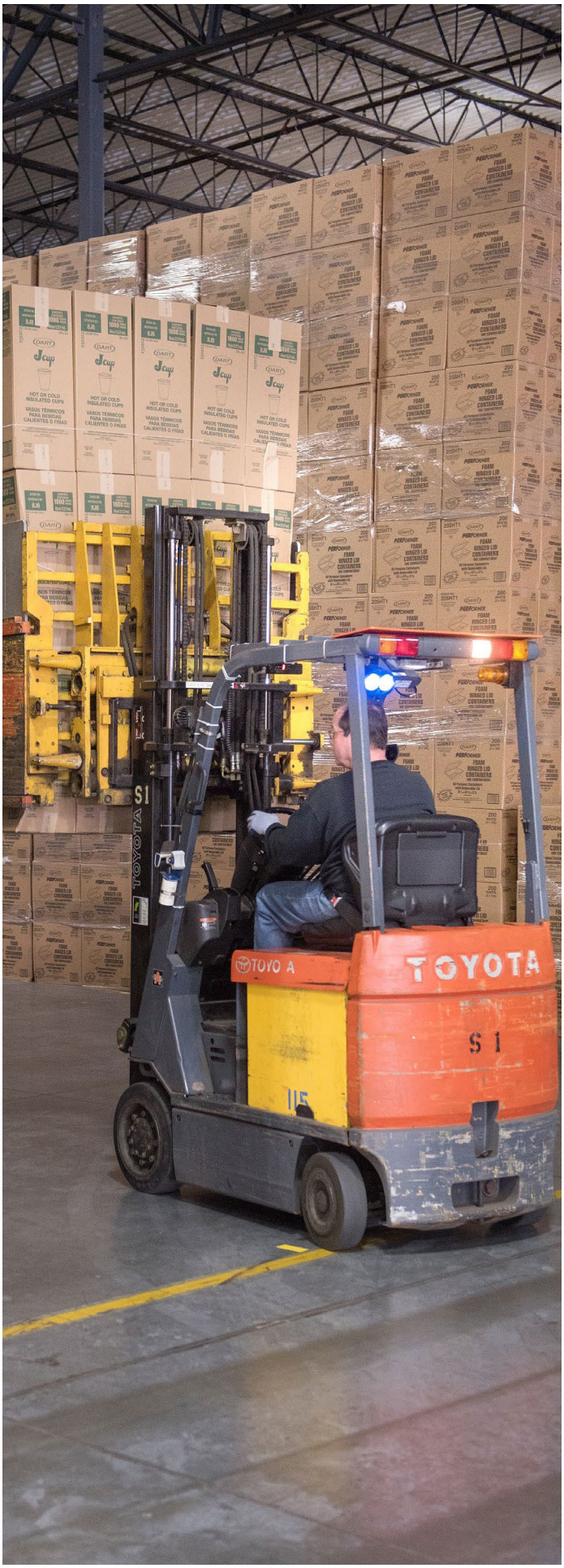
Always keep in mind

- Do not give or accept bribes or kickbacks, offer to facilitate or accept bribes or kickbacks or provide any other kind of improper payment.
- Keep accurate books and records so payments can be honestly described and company funds are not used for unlawful purposes.
- Be aware of our anti-corruption and bribery standards when selecting third parties that provide services on behalf of Dart. Be vigilant and monitor their behavior. Never "look the other way."
- Contact the Dart Legal and/or Dart Internal Audit departments if you have concerns or questions about bribes or improper payments.
- As a general rule, never do anything through a third party that we are not allowed to do ourselves.
- Be aware that not reporting a bribe or other illegal activity may in itself be an offense.

You can face severe consequences if you or one of our business partners violate anti-bribery laws. Even the perception by others that you may have acted illegally can be damaging. For this reason, always be aware of how your actions might be viewed by others, and speak up and ask questions if you 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. To that end, 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

Countries and jurisdictions need to control the import and export of products that travel across their borders. For this reason, we must honor all trade, import, customs and export laws in the countries in which we operate. If there is a conflict, or if you are not sure what laws apply, consult the Dart Legal and/or Dart Logistics departments.

Always keep in mind

- Some countries impose trade restrictions or boycotts covering specified countries, entities and individuals. Consult with the Dart Legal Department immediately if you are asked to deal with a sanctioned or restricted country, entity or individual.
- Import and export restrictions often change. If you are involved in import and export, make sure you are up to date on the relevant rules.
- 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 you are on a trip and purchase or receive goods related to the business, you are not permitted to bring these items into the country as part of your personal customs declaration.
- If you are subject to any obligations resulting from cross-border travel, including immigration, payroll and personal tax requirements, you are responsible for complying and, where necessary, seeking assistance from the Dart Legal Department.