

LEGAL COMPLIANCE

EMPLOYMENT PRACTICES

NORPAC uses fair employment practices and strives to provide a safe and productive work environment for its employees.

The company expects its suppliers to also maintain fair employment practices—specifically:

Note: NORPAC relies on many outside resources, including contractors, subcontractors, suppliers, vendors, consultants and others. For simplicity, all third-party providers of goods and services to NORPAC are referred to as “suppliers” in this code of ethics.

Fair working conditions: Adhere to relevant employment laws, including those related to maximum hours of daily labor, rates of pay, minimum age, privacy, and other fair working conditions. Prohibit the use of child labor.

Freedom of engagement: Prohibit the use of chattel slaves, forced or bonded labor, or coerced prison labor.

Freedom of association: Respect the right of employees to freely organize and bargain collectively.

Nondiscrimination: No discrimination in employment practices, including recruiting, hiring and promoting qualified people of all backgrounds, regardless of sex, race, color, national origin, religion, age, marital status, pregnancy, physical or mental disability, sexual orientation, gender identity or any other basis protected by local law.

Harassment- and abuse-free workplace: Factories must treat every worker with dignity and respect. Workers must not be subject to physical, sexual, psychological or verbal harassment or abuse. Factories must not use monetary fines as a disciplinary practice. Furthermore, workers must be free to voice concerns to NORPAC or NORPAC-appointed staff, without fear of retaliation by factory management.

SUBCONTRACTORS

Suppliers may not hire a subcontractor to perform services at a NORPAC location without first obtaining NORPAC’s written consent. As a condition to consent, subcontractors must agree to comply with this Code of Ethics.

HEALTH AND SAFETY

NORPAC is committed to keeping safety paramount in everything we do and will do business only with suppliers who demonstrate a commitment to safety. We expect suppliers to:

- Make continuous efforts to achieve a workplace that is free from work-related injury and illness.

- Conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations- and facility-specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of their operations and the use of their products and services.
- Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- Maintain a workplace free of the effects of alcohol and drug use.

SUSTAINABILITY

NORPAC strives to manage its businesses in a sustainable and responsible way. We seek to do business with suppliers who share our concerns for and commitment to sustainable business practices. At a minimum, suppliers must meet all applicable environmental rules, regulations and laws in the countries where they do business. In addition, NORPAC will seek business relationships with suppliers who go beyond legal compliance and consistently look for new and better ways to conserve resources, reduce pollution and waste, and enhance the communities in which they operate.

CONFIDENTIALITY

Suppliers with access to confidential NORPAC information must not disclose such information to other parties without NORPAC’s written consent. Such confidential information may include, but is not limited to, the following categories of information:

- Product pricing
- Costs
- Customers
- Employees
- Operating systems, policies and practices
- Designs
- Production technologies and know-how
- Engineering, technical and scientific

DOCUMENTATION & INSPECTION

NORPAC reserves the right to monitor a supplier’s compliance with this Code of Ethics, including onsite inspections of factories. Factories must be transparent and maintain all accurate documentation on file. Factories must authorize NORPAC representatives and designated third-party monitors to engage in announced and unannounced monitoring activities to ensure compliance, including confidential worker interviews.

PRIVACY

When suppliers handle personal confidential information in the performance of services on our behalf, we require them to ensure that such information is protected against unauthorized disclosure and is appropriately safeguarded.

Suppliers must immediately report actual or possible unauthorized disclosures of personal confidential information to NORPAC IT Security, [253.924.6511], or NORPAC Ethics and Business Conduct, [800.716.3488].

Note: "Personal confidential information" is private information about employees or other individuals (e.g., Social Security numbers, home addresses and birth dates).

ILLEGAL PAYMENTS

NORPAC expects its suppliers to do business in an ethical and transparent manner. Suppliers must not offer bribes, kickbacks or improper payments of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act as well as local anti-bribery laws in each jurisdiction in which they do business.

CRITERIA FOR SELECTING SUPPLIERS

The criteria for selecting suppliers will vary but will generally focus on best value, which may include a variety of factors.

Before responding to any NORPAC RFIs or RFPs, suppliers should become familiar with and ensure that they are able to comply with NORPAC's standard terms of purchase, which are available at <http://www.NORPAC.com/standardterms.asp>. NORPAC's standard terms of purchase will apply to all transactions unless the supplier and NORPAC have an express written and signed agreement to the contrary. Terms and conditions defining relationships with suppliers are communicated early in the supplier selection process, and agreements to such terms and conditions are reached before work begins.

NORPAC'S COMMITMENT TO ITS SUPPLIERS

NORPAC's relationships with its suppliers must be characterized by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of suppliers to attain lower prices for NORPAC.
- We will not reveal a supplier's pricing, technology or other confidential information without prior written permission.
- We will not make false or misleading remarks to others about suppliers or their products or services.

GIFTS AND ENTERTAINMENT

Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence, or appear to influence, a business

decision. In order to build and maintain the trust of our stakeholders, NORPAC discourages giving or accepting gifts or entertainment exceeding nominal value, including loans and guarantees, to or from any of the company's suppliers. This applies both to employees and to immediate family members.

Note: "Nominal value" denotes an item or event of relatively low value that is unlikely to be perceived as improperly influencing the recipient, such as a logo cap or lunch during business hours.

PROMOTING AN ETHICAL CULTURE

NORPAC provides regular training to its employees in applying ethical principles to every-day decision making and manages a confidential system for raising concerns and responding to allegations of violations of its code of ethics. We prefer to do business with suppliers who also have a strong commitment to promoting an ethical culture among their employees.

RESOLVING ETHICS ISSUES

Employees of suppliers are encouraged to work through their own company to resolve internal ethics issues. However, suppliers should promptly report violations of this code or any unethical behavior by a NORPAC employee to a NORPAC manager or, if that is not feasible, to NORPAC Ethics and Business Conduct through:

- EthicsOnline
[www.NORPACethicsOnline@norpacpaper.com]

Except as required by law, persons reporting concerns may request that they remain anonymous. NORPAC Ethics and Business Conduct makes every attempt to protect the confidentiality of information provided to it—unless maintaining confidentiality would create a significant health, safety or legal risk.

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