

California Supply Chains Act

Dart Container Corporation (“Dart”) and our subsidiaries seek to observe the highest ethical standards in conducting business, including, at a minimum, observing all laws and regulations governing business transactions. The expectation we have set for ourselves is to treat people with respect, dignity, honesty, professionalism and integrity. Dart’s commitment to these principals is communicated in our [Dart Container Corporation Code of Conduct for Suppliers](#) and [Solo Cup Company Code of Conduct for Suppliers](#).

Dart makes the following disclosures in accordance with the California Transparency in Supply Chains Act of 2010.

Verification

Dart is committed to fair labor practices within our supply chain. Dart, therefore, retains the right to verify supplier compliance with its Code of Conduct for Suppliers. At this time, Dart does not engage in formal verification activities to identify, assess and manage the risks of human trafficking in its supply chain.

Audit

Dart reserves the right to conduct or have its designee conduct unannounced inspections of suppliers and their business practices, records and facilities. If housing for suppliers’ employees is provided, access to inspect the housing accommodations is also required. Private interviews with suppliers’ employees will be permitted as part of the inspection process. Suppliers will keep all information necessary to document compliance with these standards readily accessible. Any supplier who refuses to allow such inspections or interviews, or who does not comply with these standards, will be subject to immediate termination of its status as an approved qualified supplier.

Certification

All Dart suppliers, both domestic and international, must, at a minimum, conduct their business activities in strict compliance with all applicable legal requirements and published industry standards pertaining to employment and their industry, and each Dart supplier shall so certify its compliance. Dart suppliers must also certify that they comply with all standards set forth in the company’s Code of Conduct for Suppliers. Any supplier who does not comply with these standards will be subject to immediate termination of its status as an approved qualified supplier.

Internal Accountability

Dart maintains a Legal and Social Accountability Policy to affirm that it does not condone or support unlawful labor practices in any way. Employees with knowledge of unlawful labor practices under this policy must immediately report the incident. Employees may report violations of the policy through a variety of methods. Supervisors or managers who receive reports of unlawful labor practices are obligated to report such incidents immediately to the appropriate parties for investigation. Investigations under the Legal and Social Accountability Policy will be conducted in a prompt and thorough manner. Any unlawful labor practice will be dealt with swiftly and appropriately. Retaliation is strictly prohibited under the policy.

Training

All employees involved in shipping and receiving functions in Dart's California production and distribution facilities are trained on the requirements of the California Transparency in Supply Chains Act of 2010. Additionally, Human Resources Managers in all Dart production facilities are responsible for the location's Social/Workplace Accountability compliance audits and will be trained on the requirements under those audits.