



Effective Date: December 13, 2022  
Policy Title: Veritiv Corporation  
Supplier Code of Conduct

Policy Group Owner: Sourcing Processes

## **(1) The Veritiv Values Set Expectations for our Suppliers' Entire Supply Chain**

As set forth in our Code of Business Conduct and Ethics, Veritiv Corporation, through our operating companies and subsidiaries, ("Veritiv") conducts our global business with honesty and integrity, treats people with dignity and respect, and honors applicable laws, regulations and treaties ("laws") of the countries where we operate. We provide safe and healthy workplaces and respect the environment. We select suppliers who embrace our values. This Supplier Code of Conduct ("Code") outlines expectations for our suppliers, their parent entities, subsidiaries, affiliates, employees, representatives, subcontractors, sub-suppliers and others within their supply chain ("Suppliers"). We expect Suppliers to take commercially reasonable action to ensure that their entire supply chain complies with this Code as well as the Veritiv Code of Business Conduct and Ethics - <https://ir.veritivcorp.com/governance/governance-documents/Code-of-Business-Conduct/default.aspx>.

## **(2) Global Compliance**

Suppliers shall honor applicable laws of the countries where they operate. In addition, suppliers shall comply with the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act, Money Laundering Prevention Laws, Export Control Laws, Anti-Boycott Laws, Anti-Dumping Laws and others, that apply to Veritiv's global business. Suppliers shall uphold consistent global compliance.

## **(3) Business Conduct and Ethics**

**Illegal Payments, Corruption and Bribes.** Suppliers shall not engage in any corrupt practices including without limitation extortion, false declarations, bribery, money laundering, supporting or being involved with terrorist or organized crime organizations or activities. Suppliers shall not offer bribes, kickbacks, illegal political contributions or other improper payments to any third parties, including without limitation our employees and government officials. Gifts, favors or entertainment that obligate or appear to obligate the receiver are forbidden.

**General Contracting Ethics and Fiscal Integrity.** Suppliers shall meet their contractual obligations. Their representations must be accurate and truthful. They shall keep accurate records that comply with applicable law. Suppliers shall adopt records retention practices required by us, our customers, and the U.S. federal government.

**Conflicts of Interest.** Suppliers shall disclose any potential conflicts of interest. Such conflicts include without limitation their employees' relationships with our employees and our employees' interest in the supplier's business.

**Securities and Insider Training.** If a supplier learns of material non-public information while working with us, the supplier must not share this information with others or use it for market trading.

**Antitrust and Competition Laws.** Suppliers must not illegally limit trade or competition. They shall not offer any confidential information about our competitors to our employees.

**Gift Giving and Political Contributions.** Inappropriate, lavish or repeated gifts to our employees are forbidden. Suppliers must not offer entertainment or gifts to government officials. Suppliers shall not make direct or indirect political contributions on our behalf.

**Intellectual Property and Data Privacy.** Suppliers shall protect our intellectual property rights, trade secrets and proprietary information. Suppliers must protect personally identifiable information from unauthorized disclosure.

#### **(4) Workplace, Labor and Human Rights**

**Respect and Dignity.** Suppliers' workplaces shall be free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse and discrimination.

**Wages and Benefits.** Suppliers shall honor applicable laws governing wages and working hours, including compensation, benefits and overtime.

**Nondiscrimination.** Suppliers shall make hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, and discipline and termination solely on the basis of a worker's skill, ability and performance. Suppliers must not discriminate based on any classification protected under applicable laws.

**Freedom of Association.** Suppliers shall respect employees' right to join or not to join any lawful association without fear of retaliation.

**Child Labor and Forced Labor.** Suppliers shall comply with applicable laws prohibiting human trafficking, slavery and forced labor. Suppliers must refrain from any conduct that uses threats, force or any form of coercion, abduction, intimidation, retaliation or abuse of power for the purpose of exploitation, forced labor or slavery of any individual. Suppliers shall respect applicable laws establishing a minimum age for employment. If no minimum age is established by the respective country or local jurisdiction, workers must not be younger than the age of compulsory education; or if no minimum age for compulsory education is established, workers should not be younger than age 14. Workers under 18 years of age shall not perform hazardous work.

#### **(5) Doing Business with the U.S. Government**

We act as a primary U.S. government contractor or subcontractor to other primary U.S. government contractors. Suppliers shall comply with all U.S. government contract specifications. Suppliers shall comply with all applicable requirements of the Federal Acquisition Regulation ("FAR"), including but not limited to those clauses referenced at FAR 52.212-5, the full text of which can be found at <https://www.acquisition.gov/>. Suppliers cannot be debarred, suspended or otherwise ineligible to do business with the U.S. Government. Suppliers are not allowed to offer, give or promise to give anything of value to government employees or their immediate family members. Suppliers must disclose any credible

evidence of a violation of federal criminal law involving fraud, conflict of interest, bribery, illegal gratuities, government overpayments or violations of the False Claims Act.

## **(6) Health, Safety and the Environment**

**Workplace Health and Safety.** Suppliers shall provide secure, safe and healthy workplaces. Suppliers shall maintain resources to reduce the risk of accidents, injuries and exposure, especially where hazardous materials are present.

Suppliers must have well-established safety procedures, preventive maintenance and protective equipment that complies with applicable law.

**Respect the Environment.** Suppliers must comply with all applicable environmental laws, including those relating to hazardous materials, wastewater, solid waste and air emissions. We encourage suppliers to reduce the environmental impact of their operations and safeguard natural resources.

**(7) No Retaliation.** Suppliers shall assure that their employees and others in the supply chain will not be penalized for good faith reporting of suspected violations of this Code, applicable laws and regulations, or for cooperating with any related investigation. Retaliation or threats of retaliation against any person who reports a possible violation or who cooperates with any related investigation will not be tolerated.

## **(8) Accountability, Compliance and Reporting**

Suppliers shall monitor and document that their entire supply chains comply with this Code and applicable laws and regulations. Suppliers shall keep updated and accurate names, addresses, and contact information on their entire supply chain. We reserve the right to audit and investigate suppliers' and their supply chain's compliance with this Code. We may void or terminate contractual obligations with a supplier for non-compliance. Any inquiries or reports of non-compliance with this Code may be made by calling the Veritiv HelpLine at (888) 312-2693 (U.S. and Canada) or (800) 462-4240 and then dialing (877) 556-5341 (Mexico), or via the online portal at <http://veritivhelpline.com>.