December 10, 2014

Dart Container Corporation
Code of Conduct for Suppliers

I. Background

Dart Container Corporation 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.

We are a global leader in the manufacture of disposable foodservice products for the consumer/retail, foodservice, packaging and international markets. While not exhaustive, we developed this Code of Conduct for Suppliers to provide guidance on the expectations we have for our suppliers and their sub-contractors. In addition, these guidelines allow Dart to appropriately select new suppliers and locations for procurement, as well as to identify and resolve potential problems as they arise.

Given that we consider our suppliers to be our partners in success, we strive to select suppliers who have articulated a commitment to high ethical standards and conduct their operations in a manner that respects the rights of individuals they employ. Suppliers who fail to comply with this Code will not be approved as a qualified Dart Supplier and are subject to termination as a supplier to Dart.

II. Supplier Code of Conduct

Suppliers that transact business with Dart are expected to adhere to the highest standards of business conduct consistent with those described below. A supplier's commitment to full compliance with these standards forms the foundation of becoming our business partner. In addition, suppliers must comply with their contractual obligations under any purchase order or agreement with Dart.

Laws and Regulations

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. Importantly, this includes compliance with the Foreign Corrupt Practices Act (FCPA), and similar laws in countries in which we operate, which prohibits paying -- or offering, promising, or authorizing anything of value to -- a foreign government official in order to obtain or retain business. Notwithstanding these requirements, all Dart suppliers must also certify that they comply with the ethics, employment, environmental and health and safety practices set forth below.

Ethics

All suppliers shall not participate in or permit any forms of corruption, bribery, extortion, or embezzlement. Suppliers shall not offer to Dart employees gifts or any other kind of personal benefit for the purpose of influencing the decisions of Dart employees. Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws. Suppliers

will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. If applicable to the suppliers' industry, animal testing will be minimized and alternatives will be used whenever possible, scientifically valid and acceptable to regulators.

Employment Practices

Child Labor: Suppliers and their sub-contractors are prohibited from using workers under the legal age of employment for the type of work being performed in any facility in which the supplier or its sub-contractor is doing work for Dart. In no event should suppliers use employees younger than 18 years of age. Accommodations will be permitted for minors who are employed on a part time basis for summer jobs or pursuant to apprenticeships that are part of a supervised program.

Forced or Prison Labor: The use of prison or forced labor by a Dart supplier or its sub-contractor is prohibited. The use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. Suppliers will not utilize factories or production facilities that force work to be performed by unpaid or indentured laborers or those who must otherwise work against their will, nor shall they contract for the production of products for Dart with sub-contractors that utilize such practices or facilities.

Working Hours and Conditions: All applicable laws, regulations, codes and industry standards pertaining to vacation time, leave periods, holidays and the number of hours and days an employee may work with respect to both regular and overtime work periods must be followed by all suppliers. Suppliers' employees must be provided with safe and healthy working conditions and reasonable daily and weekly work schedules.

Compensation: Suppliers' employees must be fairly compensated and provided with wages and benefits that comply with all applicable laws and regulations. This includes appropriate compensation for overtime work and other premium pay situations required by applicable laws. If local laws do not provide for overtime pay, suppliers will pay at least regular wages for overtime work.

Non-Discrimination: Suppliers shall implement a policy that prohibits discrimination in hiring and employment practices on the basis of gender, sexual orientation, gender identity, pregnancy, race, religion, age, physical disability, national origin, veteran status, political affiliation, union membership or any other basis prohibited by law. Suppliers shall abide by the requirements of 41 CFR 60-741.5(a) and 41 CFR 60-300.5(a). These regulations prohibit discrimination against qualified individuals on the basis of disability or protected veterans, and require affirmative action by covered federal contractors and subcontractors to employ and advance in employment qualified individuals with disabilities and protected veterans.

Workplace Environment: Dart does not permit intimidation or hostility in the workplace. Suppliers shall not tolerate behavior in their workplace that might harass, disrupt or interfere with another person's ability to work. Unacceptable behavior includes verbal, non-verbal and physical attacks. In addition, facilities shall be constructed and maintained in accordance with the standards

set by applicable codes and ordinances. Dart also requires that its suppliers recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with applicable laws.

Illegal Drugs or Alcohol: Suppliers' employees are expected to report to work free from the influence of illegal drugs or alcohol and in condition to perform their duties. No employee of the supplier may have an illegal drug in his or her system while on the job. Suppliers' employees cannot use, possess or sell illegal drugs on suppliers' property.

Immigration Law Compliance: Suppliers shall only employ workers with a legal right to work, which must be validated by suppliers before the employment by reviewing the relevant documents. Procedures which demonstrate compliance with these validations must be implemented. Dart suppliers must regularly audit employment agencies from which they obtain workers to monitor compliance with this requirement.

Notification to Employees and Sub-contractors: Suppliers shall notify employees of the terms of these standards and post the terms on the supplier's letterhead and in local languages, in a prominent place accessible to all employees. Suppliers should take steps to ensure that sub-contractors are notified of the terms of this Code operate in an manner consistent with the terms hereof.

Environmental, Health and Safety

Health and Safety: Suppliers must provide a safe and healthy work environment to prevent accidents and injury to health occurring within or arising out of the course of work, or as a result of the operation of employer facilities. At a minimum, potable drinking water, adequate, clean restrooms, adequate ventilation, fire exits, essential safety equipment, proper safety practices for the performance of their duties, emergency aid kits, access to emergency medical care, and appropriately-lit workstations must be provided. Fire prevention equipment must be accessible and Suppliers are responsible for conducting fire prevention and evacuation training. Dormitory housing should provide clean and adequate space for employees with sanitary facilities and water supply. Restrooms should be clean and available for all employees.

Environmental: Suppliers shall comply with all applicable environmental laws and regulations and shall conduct their operations in a manner that conserves resources. All waste materials and production by-products should be disposed of properly and in an environmentally responsible manner.

III. Inspections and Record Keeping

By Suppliers: Each Supplier shall designate one or more of its management staff to be responsible for monitoring their factories and production facilities, and the production facilities of their subcontractors used in the production of products for Dart, for compliance with the standards set forth herein. Each Supplier must conduct such monitoring at minimum on an annual basis, and must be prepared to provide a completed certificate of compliance upon request. Suppliers must maintain necessary documentation to demonstrate compliance with this Code.

By Dart: 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.