

Diversity, Equity, and Inclusion Policy

Context & Scope

Context: Sustana produces sustainable, premium recycled fiber and paper. We work with leading brands, corporations, and customers to create environmentally friendly, sustainable solutions for their packaging and printed material needs and utilize post-consumer material to create high-quality, low carbon products. Our facilities, operations, and personnel, as well as the majority of our customers and suppliers, are located in the United States and Canada.

Scope: This policy applies to Sustana and all its subsidiaries and brands and all its employees.

Our Commitment

Sustana is committed to fostering a diverse and equitable workplace and cultivating an inclusive culture where every employee feels valued, respected, and has equal opportunities to contribute and succeed. This policy outlines the key principles and expectations that guide our approach to diversity, equity, and inclusion (DEI) and serves as a foundation for our actions and decision-making.

Our Program

Leadership Commitment

Sustana senior leadership is committed to:

- Create an environment in which our employees, customers, and partners are empowered to bring their authentic selves to the job.
- Establish a DEI leadership team responsible for driving the strategy, setting goals, and monitoring progress.
- Investigate and address any incidents of discrimination, harassment, or bias in a timely and appropriate manner.
- Regularly review our DEI program to ensure continuous improvement based on insights, best practices, and societal expectations.
- Implement inclusive hiring practices and training that actively seek diversity at all levels of the organization while mitigating unconscious bias.
- Review and revise existing policies to ensure they are inclusive and free from bias.
- Foster open and inclusive communication channels to encourage dialogue, feedback, and the sharing of diverse perspectives.

Diversity

- Sustana recognizes that diversity encompasses many dimensions, including but not limited to race, ethnicity, gender, sexual orientation, age, religion, disability, nationality, and socioeconomic status.
- We are committed to building a diverse workforce at all levels of the organization and ensuring that our workplace is free from discrimination, harassment, and bias.
- We will actively seek out and engage with diverse talent pools, networks, and community organizations to attract and retain a diverse and talented workforce.

Equity

- Sustana recognizes that equity is the practice of creating fair and equal opportunities for all employees, regardless of their backgrounds or identities, to access the resources, support, and tools they need to succeed.
- We are committed to promoting equity through our policies, practices, and culture by identifying and addressing systemic barriers and creating an inclusive environment that supports all employees.

Inclusion

- Sustana recognizes that inclusion is the practice of creating a sense of belonging for all employees by fostering an environment that values and respects diverse perspectives, experiences, and identities.
- We are committed to cultivating an inclusive workplace culture that encourages open communication, collaboration, and mutual respect.

Expectations and Reporting

- All employees are expected to comply with this policy and behave in a manner that supports the organization's commitment to DEI.
- All employees are expected to treat others with respect and dignity, regardless of their backgrounds or identities.
- All employees are expected to report any incidents of discrimination, harassment, or bias to their manager, their HR manager, or the appropriate designated contact.
- All employees can also report any incidents of discrimination, harassment, or bias via email to report@sustanagroup.com or hr@sustanagroup.com. Whistleblowers are encouraged to identify themselves and reports will be treated as confidentially as possible. You can also use the Ethics Reporting Hotline (3rd party hosted platform) to make an anonymous or non-anonymous report online or by phone: <http://sustana.ethicspoint.com/>
- Existing and new employees will be provided training and education to increase their awareness and understanding of DEI, non-discrimination, and anti-harassment.
- For more information regarding harassment and discrimination, see Employee Code of Conduct.

Employee and Whistle Blower Protection: Zero Retaliation

Sustana employees or third parties working with Sustana have the right to submit a confidential report concerning any incidents of discrimination, harassment, or bias. Sustana is committed to carrying out a timely investigation of any reports and ensuring the confidentiality and protection of the employee or third-party. Sustana has zero tolerance for any retribution within the company and recognizes the right of whistleblowers and will work with them to ensure there are no legal repercussions for their actions.

Governance

This policy is supported and has been approved by Sustana's ESG Committee. The Chief HR Officer and the Senior Management ESG Committee shall review this policy annually to make continuous



improvements to our DEI effort and update this policy based on insights, best practices, and evolving societal expectations.

Communication and Transparency

This policy shall be made publicly available on Sustana’s website and shared with all employees. It shall be referenced in Sustana’s Employee Code of Conduct.

Legal Disclaimers

Sustana reserves the right to modify this policy at its discretion. Updated policies will be shared in a timely manner.

Effective: June 6, 2023

Document Control

This policy must be reviewed and approved by the ESG Committee on an annual basis.

Action	Major Revisions and Comments (if any)	Version and Date
First Edition	First version drafted by Chief HR Officer, and reviewed by the CEO, COO, CCO and Vice President of Sustainability.	Version 1 June 6, 2023
Minor Update	Ethics Reporting Hotline added	Version 1.1 August 11, 2023

A handwritten signature in black ink, appearing to read 'Fabian de Armas'.

Fabian de Armas
Chairman & CEO, Sustana