

Code of Conduct



Table of Contents

3	A Letter from the CEO: Sustana Code of Conduct
4	Sustana – Our Values
7	Your Personal Responsibilities
8	Respect in our Workplace
17	Administering our Code

A Letter from the CEO: Sustana Code of Conduct

At Sustana, we are proud to be an industry-leading producer of quality fiber-based products and services. Guided by a strong commitment to sustainability and continuous improvement, our mission is to develop sustainable solutions with clean materials and a circular mindset. Our customers trust us to deliver exceptional products made with recycled content, showcasing our steadfast dedication to quality and environmental responsibility.

Our success is built on the trust and confidence we earn from customers, suppliers, and employees alike. This trust stems from consistent, positive interactions that demonstrate the respect and openness shown by our teams. By fostering these strong relationships, we empower our team to work collaboratively and achieve lasting success.

The Sustana Code of Conduct encapsulates the principles that guide our behavior and decision-making. It outlines the expectations for how every individual at Sustana—across all levels and locations—should conduct themselves when interacting with colleagues, customers, and suppliers or representing the company. Rooted in our values, the Code is a vital framework for ensuring integrity and alignment in everything we do.

It is essential that we all familiarize ourselves with the Code of Conduct, understand its significance, and embody its principles. By doing so, we reinforce Sustana's position as an admired and trusted organization—one that inspires pride among employees, garners respect from customers and suppliers, and strengthens our communities.

Thank you for your ongoing commitment to upholding our Code of Conduct. Together, we will continue to deliver sustainable, high-quality solutions and build an organization that stands as a benchmark for excellence. Thank you for all that you do to support Sustana.

Nathan Jeppson
CEO, Sustana

Sustana

– Our Values

At Sustana, we are guided by our Values. We appreciate hard work and commitment. We respect and support each other. We remain dedicated to building our team-focused organizational culture while embracing the uniqueness of each of our employees.

We seek transparency and the use of effective communication as the foundation for all our relationships. Our resources are focused on the development of the individual, team, and organization while sharing a commitment to each other's success.

SUSTAINABILITY IS OUR CORE

We believe sustainability is our key ingredient and customer deliverable.

COMMIT TO SAFETY

We have a collective responsibility to proactively ensure a safe workplace.

SPEAK UP FOR CHANGE

We partner with our customers to guide the clean material movement. Our words and actions drive change.

EXPERIMENT TO IMPROVE

We continually seek better solutions and methods to improve our processes and products.

CREATE BETTER TOGETHER

We build partnerships and teams to create new shared solutions fostering teamwork with trust and collaboration.

PURSUE RIGHT

We do right. Integrity means doing what is right even if it is hard.

Your Personal Responsibilities

FOLLOW OUR CODE

The Sustana Code of Conduct (Our “Code”) applies to each and every employee at Sustana regardless of job level, title, role or responsibilities and governs every business decision and action we take. Therefore, everything we individually and collectively do must comply with our Code, our policies and applicable laws. Our Code applies to activities at Sustana facilities and anywhere else work is being done on the company’s behalf or where work-related social functions are occurring.

LEAD BY EXAMPLE

When we personally commit to doing the right thing and walking the talk it makes others want to do the same, and builds trust and credibility.

- Take actions that support Sustana and its employees
- Be safe and follow all safety rules and procedures
- Offer solutions to issues and opportunities you see
- Respect others
- Focus on situations, not people
- Do what you say you are going to do
- Take personal responsibility – don’t blame
- Be honest
- Assume positive intent – most people are well-intentioned
- Be kind
- Don’t hold grudges – speak up or let it go
- Talk to others directly, not behind their backs
- Take care of yourself mentally, physically and nutritionally

While it is every employee’s responsibility to lead by example, an extra level of expectation is placed upon those in leadership and management roles. Not only must they be positive role models, but they must also listen and respond to concerns brought to their attention in an appropriate manner, and must discuss people or situations with the appropriate leadership team, not other employees.



SEE SOMETHING, SAY SOMETHING

It is each and every one of our responsibilities to ask questions, raise concerns, and report violations of our values, Code, policies and/or the law as they arise.

Our Code cannot foresee or describe every situation we encounter. If you have questions on how to interpret the Code, need help with a situation not expressly written into the Code, or are being asked to perform a task that you believe violates our Code or the law you can seek guidance from your immediate manager, next level manager, or Human Resources. Elevate to senior leadership if you do not feel your concerns are being addressed.

NON-RETALIATION

Founded or unfounded concerns reported in good faith will be thoroughly investigated and, if appropriate, acted upon. Retaliation against an employee who reports what they believe is or could be a violation of our Values, Code or the law, who raises questions or seeks advice or who participates in an investigation is in and of itself against our Code of Conduct and should be reported.

Respect in our Workplace

Respect is a cornerstone to success and accomplishing our goals. Self-respect means setting boundaries and taking appropriate measures if you believe you are not being treated appropriately. Respect for others is about being open to another's perspective and treating them with that same level of worth.

HEALTH AND SAFETY

Safety is both the employees' and the company's responsibility. We must help others around us be safe including co-workers, visitors, contractors and customers.

Every employee is responsible for:

- Following all safety rules and procedures;
- Wearing personal protective equipment;
- Reporting your concerns if you are asked to complete a task you consider to be unsafe;
- Reporting your concerns if you are asked to do a job for which you are not fully trained;
- Providing direct feedback to someone performing a task you believe is unsafe or that they are not trained to do;
- Reporting a vehicle or equipment that is not operating properly and may be unsafe;
- Taking a vehicle or piece of equipment down or out of service if it is not operating properly and is a danger to others;
- Reporting any potentially unsafe conditions or potential dangers.

DIVERSITY, EQUITY AND INCLUSION

Everyone should feel respected and appreciated. This makes everyone much more engaged in our company's success, and much more willing to question the status quo and share their thoughts and ideas.

By respecting everyone's talents, abilities, and experience and valuing their input we foster an atmosphere of trust, openness and candor that is necessary for Sustana to achieve its goals.

RIGHT AND FREEDOM AT WORK

Within their various establishments, Sustana will at no time resort to the labor of children under the age of 15.

The company and its representatives also undertake never to resort to forced or compulsory labor on the part of its workers. For example, employees should be free to leave work or terminate their employment with reasonable notice and should not be required to give up government-issued identification, passports, or work permits such as condition of employment.

Each employee also has the freedom to associate and the right to collective bargaining.

ANTI-DISCRIMINATION

Everyone deserves the ability to succeed and contribute to Sustana's success. Discriminating or treating employees or job applicants unfairly when recruiting, hiring, training, promoting, compensating, or any other term or condition of employment is strictly prohibited and is illegal.

All employment decisions from hiring to job assignments to promotions to separation will be based on merit, qualifications, and job related performance. Decisions will not be made on:

- Race, color, ethnicity or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Veteran status
- Any other legally protected status

ANTI-HARASSMENT

Harassment of others is not tolerated in our workplace.

Sustana will provide a workplace that is free from harassment of any kind and/or any other offensive or disrespectful conduct. We expressly prohibit harassment in the workplace or anywhere business is being conducted and we comply with all applicable laws prohibiting harassment. Where harassment is concerned it is important to note that harassment is defined as an attack on a person's dignity and physical and emotional integrity, regardless of one's intent.

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition may vary from country to country or state to state we consider the following to be unacceptable harassing behaviors:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility toward others

More specifically, sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable. It can take many forms such as:

- Sexual advances, requests for sexual favors, or unwelcome demands for dates
- Sexually oriented comments, jokes, pictures, text or email messages
- Explicit or degrading comments about appearance
- Display of sexually suggestive pictures or pornography

Sustana has a zero-tolerance policy towards any behavior (physical or verbal) that intimidates, injures, attempts to control, or otherwise threatens a person's emotional, mental or physical well-being. All threats, or insinuations of a threat, will be taken literally and seriously.

If you or a co-worker is being harassed or threatened it is your responsibility to report it. There is zero tolerance for retaliation for reporting potential harassment of any kind in good faith.

Any potential harassment or threats should be reported to your immediate supervisor, next level supervisor and/or Human Resources immediately.

SUBSTANCE ABUSE

Sustana strives to provide a safe and productive work environment. Employees that work under the influence of drugs and/or alcohol pose an unacceptable safety risk to not only themselves but others. Drugs include not only illegal drugs, but controlled substances and misused prescription medication. All employees are expected to perform their job duties free from the influence of any substance that could impact safety and/or impair job performance. Therefore, the following activities are prohibited:

- Working under the influence of alcohol, illegal drugs, or controlled substances on or off Sustana's premises
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working on or off Sustana's premises
- Working while impaired by a lawful prescription medication or over the counter drug

We recognize the powerful nature of drugs and alcohol and realize that abuse and addictions occur. If you have a drug or alcohol problem, we remind you that it is your duty to get help before it negatively impacts your life and your job. Contact your local Human Resources team to learn of available assistance programs in your area.



FIREARMS AND WEAPONS

Our company also prohibits the possession of weapons in the workplace. To the full extent permitted by local law this prohibition extends to company parking lots as well as our facilities. Weapons include, but are not limited to, firearms, explosives, knives and other weapons that might be considered dangerous and can cause harm.

DRESS CODE

Our goal is to provide a workplace environment that is professional and comfortable and inclusive for all employees. Sustana encourages employees to dress in a manner appropriate for the day's business activities; customers make decisions about the quality of our products and services based on their interactions with employees and the way you dress goes a long way in establishing trust and credibility with customers, suppliers and vendors. Office workers should dress as if they will meet customers, suppliers and key stakeholders of the company.

It is also expected that employees will not wear anything that other employees might find offensive. Attire should provide proper coverage at the neckline, hemline and waistline and not be inordinately tight-fitting.



We expect that your business attire will exhibit common sense and professionalism and will not interfere with your ability to perform your work safely (for example wearing loose fitting clothing poses a safety hazard in our manufacturing facilities).

We realize that clothing selection is highly personal and what is considered appropriate to one might be considered inappropriate by another. For this reason, we will deal with employees whose attire may not be appropriate on an individual basis rather than subjecting all employees to a more stringent dress code. In general, however, the following clothing choices are not acceptable choices:

- Clothing that is frayed, soiled, faded or torn
- Casual t-shirts (not applicable to employees working in the mill)
- Casual sweatshirts
- Jogging suits/sweat suits (not applicable to employees working in the mill)
- Tank tops (applicable to employees working in the mill)
- Midriff exposing tops
- Spaghetti strap or strapless tops or dresses
- Deep v-neck shirts or blouses
- Very short miniskirt or shorts
- Sport sandals
- Casual tennis shoes
- Flip flops
- For employees not working in the mill, wearing a baseball cap is not allowed

SHARED SPACES

Sustana's facilities are shared spaces. As a result, prominent displays that demonstrate personal preferences of groups or associations one is affiliated with are prohibited. This includes displays that show music groups, sports teams, trade associations, religious groups and similar groups that others may not be part of. Displays on your desk, office or work area that are modest and not easily visible by others are acceptable. If you have any questions regarding the acceptability of something you would like to display in your work area please discuss with your manager, next level manager or Human Resources.

NEPOTISM AND PERSONAL RELATIONSHIPS IN THE WORKPLACE

Sustana's policy is to hire, promote, and transfer employees on the basis of individual merit and to avoid any hint of favoritism or discrimination in making such decisions. The company also acknowledges the advantages of accepting employee referrals of friends and family when filling vacant positions. With that practice, however, comes the risk that favoritism or interpersonal conflicts might interfere with production or sound decision-making.

To mitigate any real or perceived risks in hiring family and friends of employees or to manage any consensual romantic relationships that may occur in the workplace Sustana has adopted the following guidelines:

- Family members include an employee's parent, child (natural, adopted, or legal guardianship), spouse, domestic partners, brother, sister, grandparent, grandchildren, in-laws and step-relationships within the preceding categories.
- Family members and friends are eligible to be considered for employment at Sustana if they possess all requisite qualifications for the position and procure the position on their own merits.
- Managers and employees will exclude themselves from any hiring process where a friend or family member is being considered for employment.
- Employees will not be assigned to a department, work area or workstation where they will be under direct or indirect supervision of a family member or romantic interest if this creates a conflict of interest or if it can be reasonably assumed that it could eventually lead to a conflict of interest.
- If during the course of employment, an employee becomes assigned to a department, work area or workstation where they will be under the direct or indirect supervision of a family member or a person with whom they're involved in a romantic relationship, the Manager, Director or the person of authority in that department has the obligation to immediately inform the Human Resources department so that appropriate measures may be implemented.
- If during the course of employment, an employee becomes a family member or becomes involved in a romantic relationship with another employee and that relationship could create a potential conflict of interest, these employees must inform the Human Resources department, so measures can be taken, if necessary, to minimize potential conflicts.

CONFIDENTIAL AND PROPRIETARY INFORMATION

During the course of employment, we will all come into contact with information that, if improperly disclosed, could harm Sustana's business or that of our customers, suppliers or other business partners.

Business and marketing plans, earnings forecasts, pricing, new product development, proprietary technical knowledge and organizational information are just a few examples of such information.

To be safe it is best to assume that all company information you have access to is confidential, proprietary, or sensitive in nature. To protect the company, you should only share information on a need-to-know basis, checking with your manager before sharing or discussing anything that is particularly sensitive be it verbally, via email or on social media platforms.

COMPANY ASSETS AND EQUIPMENT

All equipment, vehicles, machinery, computers and any other items owned by the company or located at company facilities should be treated with respect and care. Equipment and vehicles should be used in a manner consistent with operating manuals and official company policies.

All associates have a responsibility to ensure the equipment, vehicles, machinery, computers and other items used are properly maintained with the assistance of maintenance and IT teams.

Equipment is to be used for company business only and not for personal use. Office employees can use company telephones for reasonably limited personal communications at the discretion of their supervisor. All emails written on company computers are the property of the company. The company reserves the right to look back at emails for whatever reason it deems appropriate.

COMPUTER, E-MAIL, PHONE, AND INTERNET USAGE

Technology is critical to running our business. A system issue can curtail our ability to do business, impacting customer service, production and financial results. Therefore, it is more important than ever to safeguard our technology platforms by using them for authorized business purposes only. Be aware that any information you create, share, search for, or download onto company systems becomes the property of the company.

The following guidelines apply to use of our technology:

- Never download or install any unauthorized software from the Internet.
- Never open a file you cannot identify or is from an unknown person.
- Ensure your computer is secure when you leave your work area.
- Never visit sites that contain sexually explicit, illegal, unethical, discriminatory, threatening, or any otherwise inappropriate material.

The employees' personal use must not impact the company. Any occasional personal use of company systems must not adversely affect the company and may not involve outside commercial activities. We do, however, reserve the right to monitor system use at any time and delete questionable material, without notice.

SOCIAL MEDIA USAGE

Social media is an important way we connect with others. It helps us maintain existing relationships, start new relationships and communicate with customers, suppliers, and colleagues. However, misuse of social media can be harmful to you and/or the company.

The following guidelines apply to all employees regarding social media use:

- You are personally responsible for what you post, write or publish online. Please remember that everything that goes on the Internet stays on the Internet. This means everything you publish will be visible to the world for a long time.
- When discussing Sustana or brand-related matters on the Internet, you must identify yourself with your name and, when relevant, your role at Sustana.
- Very few people are authorized to officially speak for the company. If you are not one of them you must make clear that you are speaking for yourself and not for Sustana. Please always write in the first person and don't use your company email address for private communications. Even anonymous postings can be traced back to the company.
- Treat all confidential information and trade secrets of our company, of our partners and suppliers, as strictly confidential. Do not share online.
- No one is allowed to post information from internal company communications without specific written authorization. No exceptions. Messages from our leadership to all employees are not meant to be shared externally. If the company desires the communication to be external our marketing group will manage the external messaging.

- If you see something on social media regarding the company, please let the marketing group know.
- Use common sense. If you are about to post something that you feel could make you or anyone else even the slightest bit uncomfortable, review and reconsider.

CHARITABLE ACTIVITIES

Sustana believes in corporate responsibility through its environmental efforts (which is a core component of our overall business model), philanthropy (donating money, products and services) and volunteerism. Given the multitude of ways to give back, and the sheer number of worthwhile organizations to support, the company has identified organizations, causes, and activities that it will support as an organization.

We encourage each and every employee to get involved with organizations and causes that are personally important to them by volunteering, fund-raising, donations, etc. While it is acceptable to inform others in the workplace of your activities so that they can decide if they would like to join with you, it is important that it be done without pressuring others or using company assets unless approved in advance.

EXTERNAL COMMUNICATIONS

Open communication both internally and externally is positive and necessary, however one piece of information taken out of context or an incomplete, or poorly worded document can be detrimental, especially when dealing with external communications. Therefore, only authorized company representatives, namely the Executive Team, Facility Managers and Human Resources are approved to speak on behalf of the company as part of a fully developed communication plan.

If you are approached either in person or through social media by the press, investors, or market analysts to comment on company business just politely inform the requesting party that you are not authorized to discuss the subject and refer them to a member of your organization who is.

Administering our Code

REPORTING

Sustana is our company so we all need to take the responsibility to personally follow our Code of Conduct and to report any concerns you have, or observations you make that might violate our Code. The key is to report anything concerning, even if you are not sure an actual Code violation has occurred. That way we can investigate so we can properly fix issues that have occurred or prevent something from happening in the future.

While we prefer to know who is voicing a concern so we can ask any necessary follow-up questions, you are able to anonymously report them as well. All concerns should be directed to your direct supervisor, next level supervisor or Human Resources. Elevate any concerns to senior leadership if you feel they are not being appropriately addressed.

INVESTIGATING

We take all reports of suspected Code violations seriously and make investigating them a priority. We will protect the identity of the reporting party to the fullest extent possible and inform employees who have had an accusation reported about them as soon as doing so will not negatively impact the investigation. We encourage the reporting of all good faith concerns, founded or not. We will not, however, tolerate knowingly false reports. It is the responsibility of every employee to cooperate fully and honestly in all investigations and will not tolerate retaliation of any kind against anyone who shares a good faith concern or participates in a Code of Conduct investigation. Sustana employees or third parties can 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/>

TAKING ACTION

We take all Code and legal violations seriously. We will take swift and appropriate action that fits the nature and seriousness of the violation. That action could include for, instance, formal documented coaching, suspension without pay, or termination of employment. Additionally, if an act violates a law it could also result in fines or criminal prosecution.

OUR CODE IS NOT A CONTRACT

Our Code of Conduct is not a contract, does not convey any employment rights or guarantees of employment and can be modified at any time by Sustana's Executive Team.

