

Mactac Code of Business Conduct and Ethics

Mactac is and will continue to be: (1) a valued supplier of quality products to our customers; (2) an employer that provides a challenging and fulfilling occupational experience for our employees; (3) a rewarding investment for our shareholders; and (4) a responsible citizen of the communities where we are located.

To uphold this Commitment, it is essential that each and every Mactac employee protects our most important asset. Mactac's reputation for integrity. In our code of ethics, all employees, officers, and directors are referred to as "employees."

Integrity and the highest ethical standards go hand in hand. Mactac's excellent reputation is based on the actions of its hundreds of employees starting in 1959. Future success depends, in large part, on the continued good judgment of all employees. Below is a list of suggestions on how to continue to "do the right thing." It's not a "don't" list. If a question or situation seems particularly difficult, employees are encouraged to contact their supervisor or Mactac's General Counsel's office.

If we all make this Commitment, Mactac will continue to be a successful company.

Mactac is committed to hiring and promoting employees in a fair manner, based on talent and merit. All employees have the right to respect; be evaluated and promoted based on their contribution; and work free from harassment. Mactac and its employees will strive to achieve and maintain this positive work environment. Our goal is to attract and retain a diverse workforce that closely matches the diversity of the communities in which we work.

Antitrust Mactac competes aggressively and legitimately, in full compliance with all antitrust laws. Antitrust laws are designed to protect competition, and Mactac expects all its employees to adhere to these laws. Antitrust laws require that there be no agreements or understandings between competitors that affect price, terms and conditions of sale, division of markets, or any other agreement or understanding that affects competition. Mactac employees should never have any discussions with competitors regarding price or any other aspect of the competition. It is a felony to violate antitrust laws, and punishment can result in imprisonment and fines. Violation of antitrust laws can also have a devastating impact on both the Company's and the employee's business reputation.

Drugs & Alcohol Mactac is committed to providing a work environment free of illegal drugs and alcohol. Substance abuse poses health and safety risks to both the abuser and their co-workers. Our policies are designed to eliminate substance abuse, not the abuser.

Conflict of Interest Engaging in any business or activity that conflicts with, or gives the appearance of conflict with, Mactac's business activities or that misuses Mactac's resources, goodwill, or reputation may affect an employee's commitment to Mactac. If in doubt, consult with the appropriate supervisor.

Confidential information includes trade secrets, customer lists, pricing data, process information, and financial reports. Disclosing or "leaking" confidential information may aid a Mactac competitor or violate Federal or State Securities Laws.

It is Mactac's policy to comply with the letter and spirit of the laws and regulations of the countries in which we operate. It is the responsibility of each employee to be sure that Mactac is acting lawfully as to the activities for which they are responsible.

The laws governing political contributions vary from state to state, but they are generally very strict and carry serious penalties. Accordingly, Mactac will not make political contributions, reimburse employees for doing so, or authorize employees to be solicited for contributions, except in unusual circumstances and after careful management and legal review.

Internet Access and use of all e-mail and voicemail systems must be used by Mactac employees for legitimate business use and incidental personal use at reasonable levels. All electronic systems are the property of Mactac and there is no right to privacy in any material created, received, or sent on Mactac systems. Internet access is provided on an as-needed basis and requires proper approval. Access to the Internet through a modem or any networked company computer, other than through Internet gateways provided by Mactac, is prohibited. Mactac reserves the right to monitor Internet and email usage and filter or block objectionable content. The origination or communication of offensive, hostile, malicious, illegal, or abusive material, which is not in accordance with Mactac's values, is prohibited. Only standard Mactac hardware and software will be supported, and Mactac reserves the right to remove any software or hardware that is not properly licensed, supported, or disrupts network/system performance. All personal computers that are connected to the Mactac network will use standard Mactac virus protection software.

Employee participation in blogging and social computing is subject to the same principles and guidelines that apply to employee activities generally found in our code of ethics. Social computing activities include, but are not limited to, online publishing and discussion, wikis, file sharing, user-generated video and audio, and social media. Employees are expected to exercise personal responsibility and follow company policies on anti-harassment, ethics, and confidential and proprietary company information, regardless of location (i.e., at work on a company computer or in personal time with a home computer).

Gifts and entertainment Gifts and entertainment of face value that are part of the normal business process are acceptable. Any gift or offer of entertainment that can nevertheless be construed as an attempt to influence commercial judgment, should be rejected. A cash gift of any amount from a vendor, customer, or other business partner is never acceptable.

Workplace Violence Mactac is committed to providing a safe work environment for all its employees. Mactac prohibits the possession of firearms in any of its facilities in accordance with applicable laws. Employees who violate this policy against gun possession on Company premises may be subject to discipline, up to and including termination.

International Business and Foreign Corrupt Practices Act U.S. laws governing international trade controls, including boycotts and the Foreign Corrupt Practices Act, are very complex. Mactac will attempt to comply with all these laws. Mactac's policy prohibits bribery in the United States and abroad, and the Foreign Corrupt Practices Act prohibits making or offering any payment to any foreign official for the purpose of obtaining, retaining, or conducting business. Every person involved in international transactions must maintain a basic knowledge of the applicable laws and regulations.

Employees should be on the lookout for "red flags" and contact the Human Resources office or the Finance/Tax office for general guidelines or advice on particular issues of concern.

It is Mactac's policy to provide employees with an easy and efficient way to report suspected violations of various policies in the form of "ComplianceLine", a third-party ethics and compliance helpline provider.

The ComplianceLine is designed to encourage early detection of financial fraud, matters involving unethical behavior, and other employment concerns. These are serious problems that cannot be tolerated anywhere in Mactac. Mactac has a long and proud history of ethical business practices. The ComplianceLine system makes it easy for any Mactac employee to confidentially identify unethical practices or report financial fraud or employment concerns so that they can be addressed in a timely manner.

What is ComplianceLine? ComplianceLine is a unique communication system that is designed to make it as convenient and comfortable as possible for employees to send concerns, questions, and comments directly to Mactac's senior management on a confidential basis.

How is ComplianceLine convenient? ComplianceLine is convenient because all an employee needs to do to send a message is make a free call to ComplianceLine's phone message system. Once connected, the employee simply records whatever they want to communicate. Employees can use this service 24/7. Employees also have the option to report concerns online by accessing MyComplianceReport.com.

How comfortable is ComplianceLine? ComplianceLine is designed to eliminate any worries an employee may have about saying what's really on their mind. The call is transcribed by an independent third party in typed form and sent to Mactac's senior management. Unless the employee chooses to identify themselves, there is no way to know who left a message. This ensures that anything the employee says can be completely confidential and anonymous.

When should an employee use ComplianceLine? The ComplianceLine program should be used to report suspected financial irregularities, fraud, misappropriation of Mactac property, conflict of interest, or theft. ComplianceLine can be used to report on certain employment issues, such as workplace violence, gender or racial discrimination, sexual harassment, or unsafe working conditions. It can also be used to report environmental or health violation issues.

What should ComplianceLine NOT be used for? Any cost-saving suggestions, labor complaints, or unfounded accusations are all items that are treated in other ways or are simply inappropriate.

How does an employee use **ComplianceLine**?

- (a) Dial **844-816-7729** or go to **MyComplianceReport.com** and click "**start a new report**" and enter the access ID: **MAC**
- (b) Record the assigned risk assessment number and callback date.
- (c) Call back or log back in on the callback date assigned for the answer.

Tips for using ComplianceLine

- (a) Pause to consider, is this a broad issue or should the employee talk to their manager?
- (b) Write down the main points you need to make before the call goes through.
- (c) If the call requires immediate attention, the employee should say so at the beginning of the message.
- (d) If the employee wants the message to be directed at a specific individual employee, they must also indicate that.
- (e) The employee must decide whether or not they want to identify themselves in the message. If you want to be contacted, you must indicate the best way to be contacted, either at work or at home.
- (f) To help with follow-up, the employee should provide as much information as possible. It would be particularly helpful for the employee to identify their business unit and/or location.
- (g) It will take at least one business day for the employee's message to be transcribed and forwarded to Mactac. It may then take additional time to route, research, and respond to the question or concern.

Important Notice: sending a message through ComplianceLine does not constitute "legal notice" to Mactac. In addition, unless otherwise stated, ComplianceLine is not intended to replace existing compliance measures or established grievance or grievance procedures.

Supplier Code of Conduct

The Mactac Supplier Code of Conduct is committed to high standards of business ethics and collaboration on sustainability within the supply chain. Mactac is committed to lead our suppliers to better ethical, social, and environmental performance, through best practice and continuous improvement.

Where we have influence within our own and our supplier's supply chains, we will meet the expectations to be transparent on selection processes, expose breaches and encourage ethical conduct, showing respect to our environment, as well as protect human rights.

Requirements for our suppliers and contractors are set out in this Supplier Code of Conduct. Mactac reserves the right to terminate any trade agreement where a supplier is unable to demonstrate a commitment to this Supplier Code of Conduct. Where our customers are the contracting party, and Mactac is managing or supporting their purchases and / or subcontracts in circumstances where they do not have their own equivalent contract provisions, Mactac will offer its own Supplier Code of Conduct and associated sustainable procurement processes.

Our commitments are aligned to the Ethical Trade Initiative (ETI) and International Labor Organization (ILO) Conventions, and requires the following:

Local laws are respected	Employment is freely chosen
Child labor shall not be used	Illegal labor shall not be used
Appropriate wages are paid	Working hours are not excessive
Freedom of association and the right to collective bargaining are respected	Compliance with all applicable anti-corruption and anti-bribery laws
Working conditions are safe and hygienic	No discrimination is practiced
No harsh or inhumane treatment is allowed	Businesses operate ethically
No unauthorized sub-contracting is allowed	Due regard is given to environmental impacts

Mactac also makes a commitment to our suppliers to keep our trade agreements and their information confidential from customer requests, especially related to the country of origin for certain materials (i.e., pulp). We will abide by our legal responsibilities to not release this type of information.

The Mactac Supplier Code of Conduct is available and applies to our suppliers, employees and all our business dealings and transactions in all countries in which we operate. The goal is to strengthen the understanding of how these principles should be practiced in all aspects of business-related activities, making sure to protect the health of the people and the environment.

Mactac aims to operate responsibly wherever we work in the world and commits to engaging with our stakeholders to manage the social, economic, and environmental impacts of our activities.