

California Transparency in Supply Chains Act Disclosure

Caraustar Industries, Inc. and its subsidiaries (collectively, "Caraustar") are opposed to all human trafficking and slavery, regardless of whether in their operations, their suppliers' operations or elsewhere. Caraustar generally engages in business with known, reputable companies in its supply chain and the vast majority of the products that Caraustar purchases to manufacture its products are collected or purchased from vendors located in the United States. For that reason, Caraustar does not believe there is an appreciable risk of our direct suppliers engaging in human trafficking or slavery.

Caraustar's procurement employees are encouraged to report any suspected human trafficking or slavery to the General Counsel or anonymously through Caraustar's employee hotline.

The following disclosures are made pursuant to the California Transparency in Supply Chains Act of 2010 (Section 1714.43 of the California Civil Code) (referred to in this disclosure as the "Act").

To what extent, if any, does Caraustar:

(1) Engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery? Caraustar does not engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery. Caraustar does attempt to do business with known, reputable suppliers and to incorporate a general compliance with law provision in contracts it enters into with its suppliers.

(2) Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. Caraustar does not audit suppliers for compliance with company standards for human trafficking and slavery. If there is any reason to suspect that a supplier is not complying with applicable human trafficking and slavery laws, then Caraustar will address the matter with the supplier.

(3) Require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Caraustar does not require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. However, Caraustar does attempt to incorporate a general compliance with law provision in contracts it enters into with suppliers.

(4) Maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking. Caraustar employees are required to annually acknowledge and continually comply with Caraustar's Standards of Business Conduct (the "Standards of Conduct"). While the Standards of Conduct does not specifically address human trafficking and slavery, it does require that employees be in full compliance with the letter and spirit of all applicable laws, rules and regulations. The Standards of Conduct also encourages reporting of any suspected violations of applicable law either directly or anonymously through Caraustar's employee hotline. Caraustar attempts to incorporate a general compliance with law provision in contracts it enters into with contractors.

(5) Provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products. Caraustar does not provide such employees and management with training specifically on human trafficking and slavery. However, such employees are subject to the Standards of Conduct and they attempt to incorporate a general compliance with law provision in each contract with a Caraustar supplier.