

The Veritiv Code of Business Conduct and Ethics

Getting to what matters most. By doing the right things right.



WELCOME

At Veritiv, we help our customers get to what matters most to them – one package, one delivery, one solution at a time.

To accomplish this, we are guided by our Veritiv CODE of Values. These values unite us as one team; they represent who we are as a company and how we operate. They are what make us unique. The Veritiv CODE is our guidepost for decisions on all that we do to get to what matters most.

Our Vision: To be the most desired B2B design-to-delivery provider by serving our customers with a solutions-first mindset.

Our Values:

- C** **Cultivate Innovation.** Through diverse people and ideas.
- O** **Own It.** Simplify the process. Accelerate the solution.
- D** **Deliver and Delight.** Every day. In every way.
- E** **Embrace the Green.** One team, shaping success for ourselves, our customers, and our planet.

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A MESSAGE FROM SAL

Our Veritiv CODE of Values is the foundation of who we are and reflects how we operate as an organization. These values define us. They inform our stakeholders what we stand for and what they can expect when interacting with us.

Equally as important is another Code – the Veritiv Code of Business Conduct and Ethics. This Code of Conduct guides each of us on the standards of conduct that support the Veritiv CODE of Values and govern our business. The Code of Conduct provides direction and a framework to ensure we act ethically, responsibly and in compliance with the law.

The Veritiv CODE and the Veritiv Code of Conduct are both essential elements of our corporate culture. Both reflect the high value we place on integrity, honesty, fair dealing, and ethical business practices.

No one employed by or representing Veritiv should ever compromise sound standards of ethical behavior. But sometimes knowing the right thing to do can be difficult. The Code of Conduct is a tool to help guide your decisions. We are counting on each of you to familiarize yourself with this Code of Conduct, adhere to its principles, as well as report any violations. We respond to all reports regarding violations of the Code of Conduct, and we will not tolerate retaliation against any employee who raises an ethical concern in good faith.

Keeping these principles at the core of our operations is key to our success. Each of us has a responsibility to be well informed about the Code of Conduct and ensure we are exercising good judgment as we conduct our business. Our continued success and corporate reputation rely on maintaining the exceptional standards that you demonstrate every day.

Thank you for your continued commitment to ethical and legal behavior, and to living our Veritiv CODE every day.

Stay safe,



Sal Abbate
CEO



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INTRODUCING VERITIV'S CODE OF BUSINESS CONDUCT AND ETHICS

What the Code of Conduct Is....

Veritiv's Code of Business Conduct and Ethics is a set of standards created to govern how we each are expected to conduct ourselves, make business decisions, and handle potential ethical dilemmas. It is an instruction manual that builds upon our Veritiv CODE of Values and guides how we do business ethically, responsibly, and in compliance with the law.

The Code of Conduct goes beyond simply just following the law. It ensures we are making decisions and following through in a way that reflects the high value we place on integrity, honesty, fair dealing, and consistent ethical business practices. Honesty and integrity, both an essential part of our corporate culture, are at its core. The Code of Conduct sets us up for success - getting to what matters most by doing the right things right.



What the Code of Conduct is not....

It is not possible to develop a comprehensive rule book with answers to every problem or possible scenario that could arise in the course of business. Instead, the Code of Conduct provides a foundation for decisions you make and how you accomplish your jobs daily. It is also reinforced and supplemented by other resources.

Training on the Code of Conduct is required for all employees to help familiarize you with key concepts and reinforce the importance of acting in a manner consistent with our values and the highest ethical business standards. We rely on your good judgment and ability to speak up and ask if something is not clear.

The Code of Conduct is also not a stand-alone document. It works in conjunction with other Veritiv policies and procedures including those that are located on [Vibe](#). In rare cases, there may be discrepancies in the language between the Code of Conduct and other policies. If this is ever the case, the more specific language will apply.

For employees covered under a collective bargaining agreement, if there is a conflict between the provisions of the Code of Conduct and the agreement, the provision in the collective bargaining agreement will supersede the Code of Conduct.

Just as business and market dynamics change, so may the Code of Conduct. It is not meant to be a static document. There may be times when a clarification, addition, or change to the Code of Conduct is required. Those changes can only be made by our Board of Directors.

Taking Responsibility: We are all in this together

The Code of Conduct applies to all Veritiv employees and anyone operating on our behalf. It means we are all responsible for understanding and upholding the Code of Conduct, following all laws in the regions we operate around the world, and ensuring ethical and honest decision making.

Decision guide on making ethical decisions:

When making potentially difficult decisions, ask yourself the following questions:

- **Is this action legal?**
- **Is it consistent with Veritiv's CODE of Values, our policies, and our Code of Conduct?**
- **Would I be ok if my action was made public?**

If you can easily answer **'YES'** to all of these questions, then you are ok to act.

If the answer to any of these is **'NO'** or you are **'UNSURE'**, then do not proceed and ask for assistance from your manager.

Making business decisions can be complicated. Sometimes the way is not always clear. So, if ever in doubt, speak up and ask.



The Code of Conduct means nothing unless we all take it seriously. If you have a concern about a potential violation – you have an obligation to [report](#) it. A single illegal or unethical decision could result in lost business, financial or legal consequences. It can subject individuals and the company to possible fines and criminal liability. And, most importantly, violations can negatively impact Veritiv's employees and the company's reputation.

See something, say something

We can only address potential issues if we are aware of them. You can never predict the possible chain of events that could occur because of actions that are inconsistent with our values or our Code of Conduct. Reporting concerns about potential violations is critical to helping Veritiv take positive action to protect our company and our reputation. You can ask a question or report a concern by clicking the “Ask a Question or Report a Concern” tab below.

Managers should lead by example

Our Veritiv people leaders have an even greater duty to uphold the Code of Conduct by ensuring their teams understand it and are acting in a manner aligned with its guidelines. Some ways leaders are expected to support and encourage their teams to consistently act in ways that reflects our values and Code of Conduct include:

- **Be a courageous leader and demonstrate ethical behavior.** Lead by example and hold your team to the same standard. Spotlight and reward good behavior.
- **Have a real open-door policy.** Don’t just have an open door, encourage employees to use it. Be accessible to your team and create an environment where employees feel confident making decisions, asking questions, and reporting possible concerns.
- **Promptly address questions and concerns and let employees know their matters are being investigated.** This includes escalating issues to Human Resources or the Legal Department when appropriate. Take action whether the issue was brought to your attention directly, or you became aware of the potential concern through another channel.
- **Treat your employees with dignity and respect.** Never respond to a question or concern in a way that might discourage an employee from raising a concern or participating in an investigation. Retaliation is never acceptable.



Suppliers and vendors must comply with our Code of Conduct

Veritiv identifies suppliers based on the quality, cost, and reliability of their products. Equally important in that selection process is ensuring each potential supplier demonstrates the highest standard of ethical business conduct. We will never knowingly do business with suppliers or vendors that operate in a manner that violates our Code of Conduct or other applicable laws or regulations, including environmental, employee, and safety laws.

All suppliers and vendors doing business with us are required to abide by a similar set of standards established in our [Supplier Code of Conduct](#). We ensure compliance with these guidelines through due diligence and periodic supplier audits. If you ever have a concern about any third party Veritiv does business with, [report](#) it immediately.



Asking questions and reporting concerns:

If you have a question or suspect a violation of the Code of Conduct, the law, or any Veritiv policy or procedure, it is your responsibility to promptly report it utilizing one of the following methods:

1

Your manager. Typically, your manager is a good first contact for any questions or concerns. You can report a concern to your immediate supervisor or manager, or your next level manager.

2

Human Resources. If you are not comfortable speaking with your manager or next level manager, or your manager is part of your concern, another good resource is a Human Resources Business Partner.

3

HelpLine. You can also contact the Veritiv HelpLine online at <http://veritivhelpline.com>, or by phone:

- In the U.S. at 888 312 2693
- In Mexico at 800 7770472
- In China at 400 1205047

You can also utilize this QR Code to contact the HelpLine.



The HelpLine is available for you to ask questions or to report concerns 24 hours a day, 7 days a week. As permitted by law, the HelpLine allows employees and other third parties, such as customers and suppliers, to ask questions and report concerns by name or anonymously.

Is there a specific order I need to follow when reporting a concern?

No. You can use any of the methods listed to ask a question or report a concern. Your report can be verbal or written.

I witnessed behavior that I believe violates the Code of Conduct, but I just overheard it and am not sure. Should I still report it?

Yes. Even if you are not sure, reporting a potential violation is not only the right thing to do, it is required by our Code of Conduct. We can only address issues when we are aware of them.



Understanding the complaint procedure:



Upon receiving a concern, Veritiv will promptly select a subject matter expert who will thoroughly investigate all reports of possible Code of Conduct violations.



Employees and other individuals reporting concerns will be expected to cooperate in the investigation where needed. This includes speaking with investigators and providing truthful, complete, and accurate information.



Details of the investigation will be kept as confidential as possible. However, it may sometimes be necessary to disclose details to others to help investigate, identify, or resolve the issue.



If any portion of the reported concern is substantiated, the investigator and a member of Human Resources (if Human Resources was not the investigator) will make a recommendation regarding any proposed actions to address the issue.



After the investigation is concluded, the individual reporting the concern will be informed whether the allegation was substantiated. Additional details regarding the investigation, the outcome, and any actions taken will usually not be shared with the individual or individuals who filed the report.

Employees, and those working on behalf of Veritiv, are expected to follow the Code of Conduct as well as all other policies and procedures that apply to their roles within the company. Violations, as well as failure to report suspected violations, can result in progressive disciplinary action including verbal warning, written warning, final written warning, suspension, and termination of employment. Additionally, some violations can result in civil or criminal liability.



What does 'good faith' mean?

'Good faith' means you have an honest belief that what you are reporting represents a potential violation of a Veritiv policy or procedure, our Code of Conduct, or the law. You must honestly believe there is a legitimate concern and the information you are providing is truthful. Knowingly making a false accusation or being uncooperative or untruthful in an investigation is not acting in good faith and is also a violation of the Code of Conduct.



Exercising your freedom to speak up without retaliation

Reporting unethical and unlawful behavior is vitally important to Veritiv's business and reputation and it is something we take very seriously. Reporting a potential violation is always the right thing to do. We encourage employees to speak up, ask questions, and express concerns without fear of retaliation.

When you make a good-faith report through any of our reporting methods or participate in an investigation, you can be confident your concern will be handled promptly and thoroughly - and without retaliation or threats of retaliation. Retaliation against anyone who raises concerns in good faith, or who cooperates in an investigation of a possible violation, will not be tolerated. If you have any concerns about retaliation, potential retaliation, or believe someone has discouraged others from making a good-faith report about a possible violation of a Veritiv policy or the Code of Conduct, you must [report](#) it.

CULTIVATE INNOVATION THROUGH DIVERSE PEOPLE AND IDEAS.

At Veritiv, we know we can only be at our best when our employees are at their best. We are a community of highly-engaged, high-performing individuals who bring diverse perspectives and a passion for collaborating to solve our customers' most complex supply chain needs. We firmly believe that this culture of inclusion is not only better for our employees, but also leads to more innovative solutions to business challenges, and ultimately better financial performance. That is why ensuring a safe and supportive environment for all employees is a key priority.

Encouraging and Celebrating Diversity, Equity, and Inclusion. Because we want you to be the best you, with us.

Our people are our why – they lead our businesses, create innovative supply chain solutions, and work on the frontline to deliver and delight our customers. We work hard to ensure our employees feel included and accepted, and have equitable opportunities at work, which is why we celebrate a workforce of people from many different experiences, cultures, and backgrounds.



Veritiv is proud to be an Equal Employment Opportunity (EEO) employer insisting on fair and unbiased hiring and employment practices. We respect and value what diversity, equity, and inclusion bring to our organization and the positive impact they have on our team and on our business. We are actively creating an environment where you have an opportunity to achieve your personal and professional goals by focusing on qualifications, skills, and experience, instead of individual characteristics.

We are intentional in our efforts to encourage and support transparent and courageous dialogue about inherent differences among those in our workplaces. Embedded in our Veritiv CODE of Values is the strong belief that all employees should be open to learning about, understanding, and supporting the experiences of others.

For more information, please visit our [Diversity, Equity and Inclusion site](#) and [Equal Employment Opportunity Policy](#).

We make employment decisions based on criteria that truly reflect the individual's ability to do a particular job. That means viewing candidates and employees through an inclusive lens based on their qualifications and without regard to personal characteristics that are not job related. It also means ensuring a diverse group of interviewers to ensure a broad range of perspectives are represented in the hiring process.

What are considered protected characteristics?

Protected characteristics include race, ethnicity, ancestry, citizenship, color, religion, religious creed, gender, sex, sexual orientation, sexual stereotyping (including assumptions about a person's appearance or behavior, or gender roles), marital status, age, pregnancy/childbirth, medical conditions, physical or mental disability, gender identity or expression, genetic information, national origin, protected military or veteran status, political affiliation, union membership, and any other classification specifically protected by law.

Preventing harassment and bullying

For employees to thrive at work they need to feel safe and respected. We all play an important role in creating and maintaining a respectful work environment. Bullying and harassment of any kind - whether based on protected characteristics or not - are

never acceptable and will not be tolerated. We take a strong stand against inappropriate and offensive comments which have no place at Veritiv.

If you experience any concerning behavior, or see it happening to someone else, you have an obligation to do the right thing and act. You can [report](#) any harassing or bullying behavior.

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Harassment and bullying can happen in many forms and in many different situations:

- WHO:** Colleague, manager, customer, vendor, or any other third party
- WHERE:** On or off company property, in person, or virtually
- WHEN:** Anytime, during or outside of work hours
- WHAT:** Any type of intimidating, hostile or offensive conduct that could impact a person's ability to do their job

I overheard some coworkers making offensive comments and jokes. If I was not part of the discussion, should I get involved?

Yes. If you feel safe and comfortable addressing the situation, you can let your coworkers know their comments could be considered offensive and are not consistent with Veritiv's Code of Conduct or our CODE of Values. If you do not feel comfortable addressing it directly, or the behavior continues, it is important that you [report](#) it immediately.



Staying safe at Veritiv

We believe our employees deserve to return home from work each day just as they arrived. That's why we place a significant focus on cultivating a safe work environment by targeting ZERO injuries. Our proactive safety culture is regularly reinforced through policies, training, leadership communications, safety risk assessments, as well as other safety initiatives.

Safety is a shared responsibility, and all employees are expected to:

SEE IT Be alert and vigilant. Identify potential safety issues.

SAY IT Speak up. Report any safety incidents or concerns.

OWN IT Do the right thing. Follow through until a safety concern or issue is addressed and resolved.

Employees are responsible for knowing and following all environmental, health and safety laws, regulations, and Veritiv policies, as well as Occupational Safety and Health Administration (OSHA), Department of Transportation (DOT) and Federal Motor Carrier Safety Administration (FMCSA) and comparable local regulations that apply to their position. If you ever have a question about what rules to follow or what they mean, reach out to your manager and ask.



Employee Safety Obligations:

- Follow all safety policies, rules, laws and regulations that apply to your role and location – including office and remote work settings.
- Never compromise safety for speed.
- Immediately report all accidents and workplace injuries.
- Immediately report any unsafe situations.

Leader Safety Obligations:

Follow all Employee Safety Obligations, plus:

- Promote a safe work environment.
- Encourage the reporting of safety issues without fear of retaliation.
- Never pressure anyone to do something unsafe.

For more information regarding safety initiatives, please see the [Environmental Health and Safety Policy Statement](#) and [Safe Driving Policy](#).

An employee on my team thinks he hurt his back while unloading the truck this morning. Do I report this as a workplace injury?

Yes, anytime an employee says they hurt themselves while on the job, we must treat this as a workplace injury and follow all reporting procedures.

I have a safety concern, but if I bring it up now, it will slow down our work and we may miss a deadline. I don't want my supervisor to be upset with me. What should I do?

Deadlines are important, but the health and safety of our employees always come first. The company always wants you to bring up health and safety concerns immediately, even if that means slowing production, missing a deadline, or losing a business opportunity.

I overheard a driver talking about getting a speeding ticket while making a delivery to a customer. Does this need to be reported?

Yes. Anytime a driver gets a speeding ticket, there are procedures to follow. It should be reported to the Transportation Safety Manager and the employee's direct supervisor.



Ensuring a drug-free workplace

The safety of all our employees is paramount. An employee who is impaired by alcohol or drugs at work can create a hazardous work environment for themselves and for those around them. The use, possession, or distribution of alcohol and illegal drugs at work is strictly prohibited. If you suspect an employee is under the influence of alcohol or drugs at work, report it immediately. [report link]

For more information refer to [Substance Abuse Prevention Policy](#) and [Substance Abuse Prevention Policy - US CDL Drivers](#).

Fostering a violence-free culture

Feeling safe in the workplace fosters productivity, camaraderie, and the free flow of ideas. As an employee, you have the right to feel safe at all Veritiv locations, and the obligation to report any potential issues. We strictly prohibit all behaviors that could disrupt the workplace or put our employees at risk, including:

- Threats of violence – whether verbal or written – against our people or our property
- Intimidating behavior
- Fighting
- Carrying firearms or other weapons
- Defacing or damaging property
- Theft

You are expected to consistently practice safe behaviors to prevent potential safety issues. Examples of this include:

- Never letting people use your badge to gain access to a Veritiv, customer or supplier location.
- Never propping or leaving open secured or outside doors.
- Immediately [report](#) any suspicious behavior or concerns of violence.

For more information on workplace violence policies see: [Weapon Policy - US](#), [Weapon Policy - Mexico](#), and [Workplace Violence Prevention Policy](#).

I have a prescription for the medication I take, doesn't that mean it is ok for me to take it at or before work?

Not necessarily. If the use of that medication could impact your ability to safely perform your job, you must notify your manager or your Human Resources Business Partner.



OWN IT SIMPLIFY THE PROCESS. ACCELERATE THE SOLUTION.

Simplifying the process and accelerating the solution never means cutting corners, sacrificing ethics, or violating the law to achieve our business goals. We empower our Veritiv team to own the issues - and own the solutions - to get to what matters most by doing the right things right. This is true whether you are doing work in the United States or anywhere else in the world. The very purpose of this Code of Conduct is to ensure we are each accountable for what we do on behalf of Veritiv, and that wherever we are, we are aligned on the Veritiv way to conduct that business.

Safeguarding company assets

We know you require access to certain resources to effectively do your job. When it comes to company assets, people usually think of physical assets. But assets are much more than that. These tools - whether physical, electronic, financial, or intellectual - are Veritiv property and need to be used in a manner that respects the law and our Code of Conduct. They should never be given to, shared with, or used by anyone other than you unless you have approval and it is necessary for your job.



While we trust you to do the right thing, we also retain the right to and do inspect and monitor usage to protect Veritiv's assets, as well as those of our employees and customers that are brought to the workplace or used for work. All Veritiv assets remain the property of Veritiv and must be returned when you leave the company.

Physical assets:

Physical assets include things like computers, phones, inventory, vehicles, and office supplies. Physical assets are for your use only and they should be handled with care. Do not share company property with family members or others, and make sure you are protecting those resources from theft and damage.

Electronic assets:

Electronic assets are technological in nature like email, phone service, internet, intranet, networked services, software, and cloud storage. Use these resources responsibly. While occasional personal use is allowed, it can never be for a purpose that violates the law, our Code of Conduct, or if it interferes with your productivity at work.

A few tips on protecting electronic assets:

- Always be mindful of the websites you visit and links you click. These are the ways hackers and cybersecurity breaches happen.
- Always work on a secure server through Veritiv's network and electronic assets.
- Never load unapproved or unauthorized software onto your work computer without approval. This could violate copyright laws as well as pose risks for malware and security breaches.
- Never share passwords and do not leave files accessible to others.

When using Veritiv's electronic assets, there should be no expectation that information you share is private. Veritiv retains the right to monitor workplace communications, including internet, e-mail, telephone, and voicemail, subject to applicable laws.

Remember "Zero Trust."

If you do not know the sender of an e-mail, do not click any links, or open any attachments. Remember, sometimes bad actors make it seem like messages are coming from someone you know. Hover over the sender's name to ensure the name and the actual sender domain match before clicking links or opening files. If you think an email looks suspicious, click the "Report Phishing" button on your Outlook menu bar to report it.

My child needs to use a computer for school, is it ok to let them use my work laptop?

No. While it may seem harmless, allowing anyone else to use your work computer is never allowed. They could unknowingly access or alter company data.

Financial assets:

Financial assets include Veritiv's monetary assets including cash, bank accounts, credit, and investments. You are required to accurately track and report all finances including time worked and expenses.

Company finances are for business purposes only and should never be used for personal use. When using company funds for business purposes, be thoughtful in your spending and always report it accurately.

Can I use my work credit card to make personal purchases provided I pay it back?

No. Company credit cards are for business use only and should never be used for non-work-related reasons. If you accidentally make a personal purchase on your company card, notify your manager as soon as you realize the mistake and arrange for payment.

Information Assets:

This can be Veritiv's own information or information provided to us by employees, customers, suppliers or other third parties. Information assets include both commercial and personal information.

Confidential commercial information:

Commercial information is often referred to as intellectual property and is one of our most important assets. It includes things like creativity, ideas, plans, and trade secrets. It can take many forms, such as marketing materials, customer lists, reports, and details about projects to name just a few. If it gets in the wrong hands, this information can be used by competitors and other third parties to unfairly compete against Veritiv or damage Veritiv's business or the business of those we do business with.

Confidential personal information:

Employees and customers often entrust us with personal information, sometimes referred to as Personally Identifiable Information (or PII), as a normal course of being an employer and doing business. This includes information such as names and contact information, as well as banking and credit card information. In addition to Veritiv's expectations, there are also laws and regulations governing the collection, use, distribution, and destruction of PII relating to suppliers, customers, employees, and others.

Employees are required to take reasonable and necessary steps to protect against unlawful access to and disclosure of PII and to maintain the highest practicable level of accuracy and integrity of this data.

For more information: [Acceptable Use Policy](#) and [Travel and Expense \(TEA\) Policy](#).

A few key points to remember about commercial and personal information:

- You must take all precautions to protect this information. Do not take, use, or share this information for any non-business-related purpose.
- Limit sharing of confidential information to those who need to know it.
- Never enter confidential information into Artificial Intelligence (AI) software.
- Mark confidential commercial information and sensitive PII as "confidential." Sensitive PII is PII that, if lost or disclosed without authorization, could result in harm, embarrassment, financial loss, inconvenience, or unfairness in the marketplace.
- Password-protect or encrypt confidential files both when saving and before sending.
- Never store or transfer confidential information or sensitive PII to a personal device. This includes personal email, drives and cloud storage.
- Be careful when discussing confidential information and PII. You should not talk about it with or in the presence of anyone who does not have a business reason for knowing the information including friends, family members, or nearby strangers who could overhear the discussion.

What is confidential commercial information?

Confidential information is a broad category and includes any type of intellectual or proprietary information like business plans, marketing materials, customer files, financial reports, designs, strategy, and creative work. It is any non-public information that could be of value to a third party.

- You should always adhere to non-disclosure and other Veritiv or other third-party agreements regarding confidentiality.
- Confidential information should never be disclosed or shared with others – inside or outside of the company – without a business need and without taking proper security steps.
- Shred or destroy confidential information when you don't need it anymore and are not required to retain it for business or record retention purposes.



Accurately keeping records

Veritiv is committed to ensuring the highest legal and ethical standards are used when preparing and maintaining all documents. We must manage information in the same way we manage other assets – in support of the needs of business – while ensuring accuracy, integrity, security, and compliance with applicable law. This is necessary for our own accountability, but also to ensure we can comply with our corporate and legal obligations.

Creating accurate records

Whenever creating a document – financial or otherwise – it is important to ensure that everything you say is truthful and accurate. Forging documents and falsifying information is clearly prohibited. But you should also never state something is true if you do not know for sure it is or otherwise conceal or provide misleading information. Additionally, it is important that all material is properly cited. Never copy or plagiarize information from any source, including Artificial Intelligence software.

Ensuring financial integrity

When dealing with financial records, it is of the utmost importance that our data is accurate and complete, including the proper use and disclosure of Veritiv funds and assets. All financial transactions must be properly documented, accounted for, and recorded and done in compliance with all applicable laws. Falsifying or providing misleading or inaccurate data of any kind is strictly prohibited. This is the case for all records, including financial accounting, productivity reports, contracts, presentations, expense reports, and time records.

Complying with reporting and audit requirements

This includes not just keeping accurate records, but also complying with disclosure and audit requirements. Employees are expected to cooperate with auditors and agencies in legitimate investigations and to provide full and accurate disclosures when they are required. When it is necessary to send confidential information, it is important to only send it through secure channels and to the fewest number of people who need the information, and always in compliance with laws and regulations.

Maintaining proper record retention

Equally as important as creating accurate records is properly maintaining them. Records must be retained for business needs and always in compliance with Veritiv's Record Retention Policy and any legal holds. You should never destroy records with the intent to conceal or hide information. Immediately **report** any concerns.

For more information:

[Record Retention Policy](#), [Record Retention Administrative Procedures](#).

Someone claiming to be a government official showed up and wanted access to perform an inspection, what should I do?

Ask the person for identification and let them know you need approval before allowing them onsite. Then, immediately reach out to the Legal Department. While we fully cooperate with law enforcement agencies, it is necessary for the Legal Department to first confirm that the request is legitimate and that any such investigation is being handled appropriately.

Prohibiting insider trading and illegal securities transactions

In your role at the company you may become aware of insider or otherwise confidential information about our business or our customers, suppliers or other business with whom Veritiv interacts. Buying or selling of securities of any public company when you are in the possession of such material, non-public information - often referred to as Insider Trading - is prohibited.

You should not share material, non-public information with anyone who does not need to know such information to perform their job. As an employee, you should be sensitive to inadvertently disclosing such information such as verbally, via email or by leaving confidential documents in public places, including certain areas of Veritiv's facilities.

What does "material" mean?

The term "material" should be interpreted broadly, but generally includes information a person would want to know when deciding whether to buy or sell a company's stock including:

- Financial forecasts and results
- Potential acquisitions or sale of a business
- Termination of a relationship with a large customer or supplier
- Litigation or government investigations
- Changes to the executive team

What is non-public information?

Simply put, non-public information is information that is not available to the public. If it isn't something you can easily find online, it likely is not public.



Avoiding conflicts of interest

We recognize that everyone has a life outside of work. However, sometimes, aspects of your personal life may influence the decisions you make at work. Those situations that create - or appear to create - a conflict between your personal interests and Veritiv's interests are referred to as conflicts of interest.

It is important that all decisions you make at work are based on what is best for the company and not you as an individual. In taking steps to recognize and avoid potential conflicts, here are a few common examples of situations that could constitute a conflict of interest:

- Hiring or being in a supervisory or indirect reporting relationship with a family member or someone with whom you have a close personal or romantic relationship.
- Holding a second job that may negatively impact your work at Veritiv or be in conflict with it.
- Ownership in or involvement with any company that Veritiv competes or does business with.
- Loaning or borrowing money from parties that do business or compete with Veritiv.
- Purchasing, leasing, or acquiring any property, asset, or business opportunity if you are aware Veritiv would be interested in doing so.
- Doing business on behalf of Veritiv with a company where you have a family member who could benefit from the transaction.
- Making any investment that may impact your business judgment on behalf of Veritiv.

Not all potential conflicts of interest are necessarily problematic. However, that is a decision for Veritiv to make. If you have, or are aware of, a potential conflict of interest, you must [report](#) it immediately. We can then determine whether there is an actual conflict and, if so, how to address it. Written approval is required before continuing with a potential conflict.

We expect our employees, whenever possible, to avoid situations that can lead to even the appearance of a conflict of interest. And we expect them to be proactive and disclose any potential conflicts so Veritiv can assess before it becomes an issue. Potential conflicts of interest are not always a Code of Conduct violation, but failing to disclose one is.



It is impossible to list all potential conflicts. When assessing whether something is a conflict, ask yourself the following questions:

1

Could this situation interfere with the performance of my job?

2

Could this situation impact the decisions I make?

3

Could it appear that way to others?

Unless the answer to all three questions is "NO," there may be a potential conflict and it must be reported.

DELIVER AND DELIGHT EVERY DAY. IN EVERY WAY.

We all own the Veritiv customer experience. Although we need to actively pursue new business while maintaining current customers, we will only do so based on our ability to deliver and delight, provide innovative solutions, and promote our business externally. We do this through sharing our expertise, providing quality products, and ensuring a competitive price, but never by compromising our integrity or values.



Supporting a free market

Fair competition through a free and open marketplace ensures we can win customers by delivering and delighting, rather than through deceptive and unfair business practices. Fair competition also drives advancements in our industry, including innovative products and services, and new ways of doing business. All of these benefit Veritiv, our suppliers, and our customers.

We maintain open and honest dialogue with our customers and never intentionally mislead, omit important facts, or make false claims about our competitors or their product offerings.

There are many laws and regulations around the globe that prohibit business arrangements limiting competition. These are often referred to as anti-trust laws.

We are committed to complying with the letter and spirit of these laws in all the areas we work, and we will not tolerate any conduct that violates these important regulations.

The following types of agreements and informal arrangements with competitors are strictly prohibited:

- Price fixing - agreeing upon set prices or sale terms.
- Territory allocation - agreements about where we can and cannot do business.
- Boycotts of certain suppliers or customers or other refusals to deal - not buying from or selling to certain companies.
- Disclosures of non-public bids - sharing confidential competitive information.

Similar types of arrangements with customers and suppliers are also prohibited.

Failure to comply with Veritiv's practices or any laws or regulations in this area hinders fair competition and can lead to severe legal penalties, including criminal liability for those involved.

Anti-trust laws can be complex. If you ever have a question, just ask. And if you ever have concerns about a violation [report it](#) immediately.

In addition to not colluding with competitors, we also do not engage in anti-competitive practices against them. Examples of prohibited behavior include:

- Predatory pricing - setting an artificially low price to force competitors out of a market.
- Disparagement - making maliciously false or misleading statements about competitors.
- Interference - urging or suggesting that a customer or prospective customer break a contract with a competitor.
- Discriminatory pricing - charging competing customers different prices for the same product to lessen competition.

What should I do if a competitor approaches me with a proposal to work together to help both our businesses in a way that could limit competition?

Inform the competitor that those discussions may be inappropriate or illegal. Cease discussions with the competitor if the topics are inappropriate and immediately **report** the incident.

Avoiding bribery and corruption

A bribe or kickback can take on many forms. It is often in the form of cash, but it doesn't necessarily have to be. A bribe or kickback is anything of value promised or given to a person, entity or agency for preferential treatment or business. It could be money, gifts, service, a job, donations, tickets, or anything else that is of value to the recipient.

Bribery laws are complicated and vary by country. Violating these laws can result in significant fines and liability for Veritiv. Our policy is simple: bribes and kickbacks are never allowed in any form, in any location, regardless of who they are for or for what reason. Our Veritiv CODE of Values and our Code of Conduct dictate that we always do business honestly and with integrity. We do not offer or pay government officials, customers, vendors, suppliers - or anyone else - items of value in exchange for a potential advantage in business.

Understanding gift and entertainment guidelines

Gifts and entertainment are common ways companies, including Veritiv, create goodwill and strengthen business relationships with customers and potential customers. But sometimes these activities can blur the lines and make it difficult to make objective decisions about business partners.

At Veritiv, we pride ourselves on winning and maintaining business through our ability to deliver innovative solutions and delight our customers every day. Nominal gifts and entertainment opportunities should solely be used to further build and enhance business relationships.

Employees should avoid giving or receiving gifts or utilizing entertainment opportunities if they will create even the appearance of compromising business decisions.

Before you give a gift, check with your manager to ensure it is appropriate. If you receive a gift that violates our policy, you should return it and let the gift-giver know that, while appreciated, it is against Veritiv's Code of Conduct.

For more information: [Gift Policy](#)

My contact at a potential customer said that he would ensure our business if we paid him a small signing fee. This is a big opportunity, what should I do?

Report it immediately. This payment, regardless of size, is a bribe and is both illegal and against Veritiv's Code of Conduct.

Gifts and entertainment are allowed if they meet all the following requirements:

- Represent a nominal amount
- Reasonable and customary in value
- Given openly and transparently
- Given to promote legitimate business relationships
- Properly recorded in the company's books and records
- Tasteful and not contrary to Veritiv's CODE of Values.

Gifts and entertainment are not allowed if they are:

- Intended to obligate or could be seen to obligate the recipient to you or to Veritiv
- Cash or cash equivalents such as gift cards
- Requested by the recipient
- Contrary to a customer's or supplier's policy or code of conduct
- Given to government officials
- Not respectful of local standards



Communicating responsibly: Social media

When used properly, social media represents an excellent opportunity for employees to build their personal and professional brands. It also provides an opportunity to promote Veritiv and engage potential customers, suppliers, and candidates for Veritiv roles.

In general, we encourage employees to post public company news and share company posts to their personal social media channels. However, before doing so, it is important to keep a few things in mind:

- Never disclose non-public, confidential, proprietary, or private personal information about Veritiv, Veritiv's employees, customers, or other third parties.
- Think before you post; if you would not be comfortable with your post appearing on the news don't post it.
- Be respectful; never post discriminatory, harassing, bullying, or defamatory messages.
- Be honest and truthful.
- Always make it clear that you are speaking on your own behalf.
- Never post or otherwise communicate on behalf of the company unless you have been expressly authorized to do so.

For More Information: [Social Media Usage Policy](#)

Communicating responsibly: Properly responding to media inquiries

Government officials, the media, and other third parties frequently try to contact Veritiv for information. They do not always know who to reach out to and will often contact the first Veritiv person they can find. In the case of the media, they will sometimes stand outside a Veritiv location and wait for an employee to come out.

To ensure accurate and consistent corporate messaging, only certain individuals are authorized to respond to media and provide information and

formal statements on behalf of Veritiv. If you receive such an inquiry, politely let them know that you are not authorized to respond and refer them to Corporate Communications. Even if you are the subject matter expert related to the question they are asking, refer them to Corporate Communications and they will coordinate any potential interview or statement.



EMBRACE THE GREEN

ONE TEAM, SHAPING SUCCESS FOR OURSELVES, OUR CUSTOMERS, AND OUR PLANET.

We understand that sustainability is a responsibility and an opportunity to drive growth, profitability, and long-term value while leaving a lighter footprint on our planet. Sustainability also means making decisions today that will positively impact the wellbeing of our people, our business, and our planet well into the future. At Veritiv, we embrace the role each of us plays in ensuring we do all we can to shape the success of our business, as well as our customers' and our suppliers' businesses, in a manner that is fair, ethical, and sustainable.





Ways you can help protect the environment in your role at Veritiv:

- Reduce, re-use, and recycle.
- Turn off lights when not in use.
- Limit and responsibly dispose of waste.
- Comply with all applicable environmental laws, rules, and regulations as well as company policies.
- Source from suppliers and vendors that comply with and support these sustainability initiatives.
- Work with customers to advance their sustainability goals.

For more information: [Veritiv's Sustainability Program](#)

Protecting the planet through sustainable practices

We recognize the impact individuals and businesses can have on our communities and on our planet. Operating responsibly on behalf of the environment is a core tenet at Veritiv. We apply the highest standards to our environmental responsibilities and, as Veritiv employees, all share in that responsibility.

We collaborate with our customers and suppliers to identify sustainable alternatives for existing product offerings, introduce new sustainable products, and recommend effective solutions to meet their sustainability goals. We are committed to creating healthier, safer, and more sustainable communities through responsible operations.

Supporting human rights

As a global corporate citizen, we recognize that our responsibility to those working on our behalf goes beyond the walls of our buildings and the reach of our fleet. We are committed to acting with integrity and supporting efforts to protect the human rights of individuals in our operations and throughout our supply chain.

Veritiv's Human Rights Policy Statement, which is closely aligned to the principles of the United Nations Guiding Principles on Business and Human Rights, seeks to ensure the direct and indirect impacts of our operations on employees and external stakeholders uphold universally accepted principles of human rights. And we expect the same from our suppliers and vendors. This includes ensuring all businesses in our supply chain:

- **PROVIDE:** Fair living wages and pay for all time worked in compliance with all local laws, safe working conditions, and equal employment opportunities
- **PROHIBIT:** Child and forced labor, human trafficking, modern day slavery, harassment, and discrimination

We will not tolerate abuse of human rights in any of our operations or anywhere in our supply chain.

For more information: [Human Rights Policy Statement](#) and [Supplier Code of Conduct](#)

Connecting with our communities



Giving back to our community is not simply a value-add – it is a core responsibility, one that contributes to the well-being of our people, our business, and our planet.

Driven by Veritiv Connects, our community engagement and philanthropy program, Veritiv advances programs that help individuals learn, grow, and thrive. We do that by contributing time, talent and treasure to charitable organizations that provide mentoring opportunities and contribute to a healthy and vibrant workforce, as well as programs that help create safe and sustainable neighborhoods.

In addition to financial contributions, we contribute to the communities where we live and work by sponsoring volunteer activities throughout the year. We also encourage employees to volunteer with causes they are passionate about on their own time. For employees who volunteer through the company or on their own, we provide Volunteer Rewards for eligible employees to use to contribute to a charitable organization of their choice. Additionally, we encourage employees to make personal donations to nonprofits, many of which qualify for company matching contributions.

While we encourage employees to take an active part in their communities, volunteer activities and charitable donations are personal choices and are

Does Veritiv support any political activities?

Laws regarding political contributions are heavily governed. You should neither engage in any political activity on Veritiv's behalf, nor use company funds for political engagements without written approval from the Legal Department.



always voluntary. Employees who wish to use company time or property to support civic or charitable efforts must first obtain approval using the [Charitable Contribution Request Form](#).

If you volunteer for non-Veritiv coordinated charitable activities, always make it clear that you are participating on your own behalf and your views and actions are your own, and not that of Veritiv.

ONEVERITIVFUND

Funded by company and employee contributions, the [One Veritiv Fund](#) is an employee relief fund that provides short-term financial relief in the form of grants to eligible Veritiv employees who have suffered significant hardships.

For more information on getting involved in the Community, visit [Veritiv Connects](#).

GETTING TO WHAT MATTERS MOST. BY DOING THE RIGHT THINGS RIGHT.

The Veritiv CODE and the Veritiv Code of Conduct are both essential elements of our corporate culture and reflect the high value we place on integrity, honesty, fair dealing, and ethical business practices. But we can't do it without you. You are key to ensuring that we never compromise sound standards of ethical behavior. We are counting on you to understand the Code of Conduct's principles, use good judgment as you conduct business on our behalf, ask questions if you are unsure, and speak up to report any violations.

Keeping these principles at the core of our operations is key to our success. Our continued success and corporate reputation rely on maintaining the exceptional standards that you demonstrate every day.

Ask a Question or Report a Concern

In addition to reaching out to your manager or Human Resources, you can contact the HelpLine. You can contact the Helpline online at [veritivhelpline.com](https://www.veritivhelpline.com), or by phone:

- In the U.S. at 888 312 2693
 - In Mexico at 800 7770472
 - In China at 400 1205047
- You can also utilize this QR code to contact the HelpLine.



Additional Resources:

- [Veritiv Policies](#)
- [Additional Contacts](#)

