

DOCUMENT TITLE: <b>Compliance &amp; Ethics Training</b>		
GBS CATEGORY/SUBSECTION: <b>Compliance / Code of Conduct</b>		
EFFECTIVE DATE: <b>01-Nov-2024</b>	SUPERSEDES: <b>22-Aug-2017</b>	
DOCUMENT OWNER: <b>Holly Brodesser-Governance Paralegal</b>	APPROVED BY: <b>Jill L. Urey – VP, General Counsel</b>	
SCOPE: <b>Enterprise-wide</b>	DOCUMENT STATUS: <b>APPROVED</b>	NEXT REVIEW DATE: <b>01-Nov-2026</b>

## Compliance and Ethics

### POLICY

The Magnera Code of Business Conduct (Code) sets forth principles Magnera commits to uphold everywhere it operates. Along with Magnera’s Promise, Purpose and Beliefs, these principles govern and guide the actions of all Magnera employees and business partners acting on behalf of Magnera as sales agents. It is important to continue to review the important topics discussed in the Code. Magnera’s Compliance & Ethics Training program is one way to reinforce the content of the Code and continue to ensure Magnera employees and the Company’s sales agents are learning and reviewing compliance and ethics issues important to our business.

### PROCEDURE

**1. Code Review and Acceptance.** In 2024, the Code was revised, and the new Magnera Code of Business Conduct was developed. Training on this Code of Conduct will be available via the Company’s on-line Compliance & Ethics Training Center.

All new hires with computer access should review and accept the Code during their onboarding process. If assistance is required in accessing the training, please contact the Legal Department.

**2. Compliance and Ethics Training.** Magnera established a Compliance & Ethics Training Center to further educate select employees on compliance and ethics matters impacting our business. Training access and courses will be assigned to Magnera employees by the Legal Department in coordination with Human Resources.

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The training center can be accessed at the link below:

[Sign In - LRN Console](#)

If you need assistance with the Compliance and Ethics Training Center, please contact the Legal Department.

Training completions are tracked by the Legal Department and shared with the Senior Executive Team. Each training course will have a deadline provided to complete the training. Any assigned training must be completed by the deadline. In accordance with applicable local law and employment agreements, failure to complete the training by the assigned deadline may result in discipline.

**3. Sales Agent Training.** Magnera requires its contracted sales agents to undergo one (1) annual training via the Company's Compliance & Ethics Training Center. Training content will be suggested by the Legal Department. Each training course will have a deadline provided to complete the training. Any assigned training must be completed by the deadline. Sales agents must complete the annual training in order to remain an agent for the Company.