

Sealed Air®



Sealed Air Corporation Code of Conduct





*We are in business to protect,
to solve critical packaging challenges and
to leave our world better than we found it.*

In living out this very important purpose, we must be mindful not only of what we do, but how we do it. Our Code of Conduct guides us in how to manage our daily processes and interactions with professionalism, respect and integrity.

This is not a manual to be filed away. Our Code of Conduct embodies what we value as an organization and how we should act.

Just as we are driving operational excellence across our entire company, we must constantly be driving for a culture of excellence. Policies and products don't make a company special, people do. Each day, the people with whom we work both inside and outside of our organization determine our workplace experience. **People matter.**

Because people matter, it is the responsibility of every Sealed Air employee to work collaboratively, to be fair and honest with each other, and to continually encourage respectful communication. We want all employees to feel as though they have been treated (and are treating others) with the highest levels of professionalism and dignity. The way you speak with each other is key. **Words matter.**

Every interaction and every decision we make moves us closer or further away from the culture we want to protect and aspire to create.

Words Matter Because People Matter.



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Our Values Matter

We are in business to protect, to solve critical packaging challenges and to leave our world better than we found it.

Knowing who we are, what we stand for, and what makes us unique is essential in building a strong, unified brand and a successful culture and company.

Our values matter because they define what we believe in, and what will guide us as we work to leave our world better than we found it. Our values represent our culture, and make clear the expectations we have for one another.



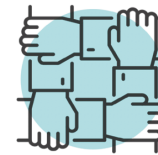
INTEGRITY

Every day, we intentionally choose to do the right thing – no matter the circumstance.



DETERMINED

We are empowered to deliver on our commitments.



COLLABORATIVE

We operate based on mutual trust and encourage diverse thinking to achieve a common objective.



INNOVATIVE

We think without limits to solve customer, company and societal challenges.



Our Integrity Matters



We Lead With Integrity.

Our Code reflects our purpose, our values, and what matters to us as an organization and is in effect all the time, everywhere. While our Code references employees (which includes employees of our affiliates and subsidiaries), it applies to anyone who conducts business with Sealed Air or on its behalf, including but not limited to our directors, officers, suppliers, and other third-party business partners.

We are all accountable for promoting an ethical culture where acting with integrity comes first. We know that even though we are not always at work, our decisions can reflect on us as employees of the company and can impact our ability to perform in our roles.

We have a responsibility to demonstrate our integrity every day; be accountable for our decisions; and never ask or direct anyone to take any action that would compromise our values, our Code, or the law.

Because Sealed Air is committed to doing business the right way, violations of the law, this Code or other Sealed Air policies may result in disciplinary action up to and including termination of employment.

While we are not expected to be experts on every topic contained within our Code, we are expected to be truthful, and not misleading, in our verbal and written communications with others; act in a way that is consistent with our values, our Code, and comply with the laws and regulations of the country (or countries) where we work. And, complete any assigned training—it is the best way to stay up-to-date on what is expected of you.

When we lead with integrity, we all contribute to the success of Sealed Air.

Making the Right Choice

An ethical decision is always a good decision.

If you are not sure whether a decision you are about to make aligns with our Code, ask yourself:

- ➔ Is it legal?
- ➔ Does it align with our values?
- ➔ Does it comply with our Code and other policies?
- ➔ Would I feel comfortable if others knew about it?

If you can answer “YES” to all of the above questions, the action likely aligns with our Code. If you answer “No” or “I don’t know” to any of the above questions, stop and reconsider. Remember, if you are unsure about a decision as it relates to our Code, policies, or the law, there are many resources available to help you make the right choice.



Integrity at Work – What Should You Do?

There is a conflict between what is in our Code and the laws in the country where you work. Which one should you follow?

Response: We must comply with the laws in every country in which we do business. Your particular country or operation may have additional policies, which are designed to reinforce and supplement our corporate policies and the Code. These additional policies are important and you should familiarize yourself with them. The best approach in this situation is to follow the stricter requirement, and if that is not clear, seek guidance from the Legal Department.



Our Integrity Matters

Our Integrity Matters

Our Responsibilities

We are all responsible for maintaining our ethical culture.

Integrity starts at the top. People leaders have a responsibility to set an ethical example for other employees and demonstrate through words and actions that integrity comes first. This responsibility also includes, but is not limited to communicating to team members our continuous commitment to acting ethically; holding people accountable if they don't; creating an atmosphere where employees feel comfortable raising concerns; and escalating ethical concerns or reports of misconduct to the appropriate Company resources.

Speak up. We all have a responsibility to speak up if we see something that is inconsistent with our Code that may put our reputation, employees, or our business at risk. We know it takes courage to raise concerns, but you can be confident that you are doing the right thing and that your concern will be reviewed promptly and appropriately.

Just Ask. If you do not understand something within our Code or in another policy, or are unsure about a decision, ask your manager or reach out to other company departments such as Human Resources or the Legal Department. You can also use our ethics hotline known as the "Integrity Line." Remember, it is always better to obtain guidance before taking action.

No retaliation. Retaliation is unacceptable within our organization. We want people to feel comfortable coming forward with any concern, so as a company, we do not tolerate retaliation or reprisal against anyone who speaks up in good faith about suspected unethical or illegal behavior. If you believe that you or someone you know has been retaliated against, we need you to speak up.



Integrity at Work – What Should You Do?

Perhaps due to cultural norms in your country, it is not common to report a concern about someone who is in a leadership position, which makes you unsure about speaking up about your manager who you believe violated our Code. What should you do?

Response: It is important to speak up in this situation. There are many ways in which an employee can report concerns. Sealed Air respects its diverse workforce, considers the different cultural norms when looking into concerns and takes appropriate actions to protect the identity of the person who is sharing the information, as well as the information being shared to the extent it is able.



Our Integrity Matters

Resources | There are many resources available to help you make the right choice.

We know there might be some uncertainty when making a decision, which is why our Code is not meant to be a set of rules and is not intended to cover every decision you will face. The resources below are always available for you to raise your concerns or seek guidance. And remember, no concern is too small to report.

Where to Start

If you have a question, problem or a general concern, your manager should generally be your first point of contact. While no one is required to follow a certain chain of command with respect to reporting concerns, your manager is likely in the best position to understand your concern and take appropriate action.

If you are a manager and receive a complaint regarding a potential violation of our Code of Conduct or the law, you should forward them to the Legal Department—or, in the case of reports coming from outside the United States, to your senior HR or Legal representative in your region.

If you're uncomfortable speaking with your manager, or if you have already shared a concern and feel it is not being addressed appropriately, you can reach out to your Human Resources representative or another member of management in your region.

Additional Resources

You can always contact one of the following resources with a question or concern:

The Legal Department

General Counsel
Sealed Air Corporation
2415 Cascade Pointe Blvd.
Charlotte, NC 28208 (USA)

The Audit Committee of the Board of Directors (For accounting or auditing matters):

By email addressed to: auditcommittee@sealedair.com

By mail addressed to:

Audit Committee
c/o Corporate Secretary
Sealed Air Corporation
2415 Cascade Pointe Blvd.
Charlotte, NC 28208 (USA)



Our Integrity Matters

Additional Resources

The Integrity Line—Available 24/7.

Sealed Air's ethics hotline (known as the Integrity Line) is operated by an independent, third party reporting service. The Integrity Line is available anytime, via phone or web, for anyone (including non-employees) to seek guidance or report allegations of violations of our Code, our policies, or the law. For employees, the Integrity Line is designed to supplement existing reporting channels—not replace them.

How To Report

Online Reporting: [Integrity Line Website](#)

Telephone Hotline: 1-888-760-3137 (U.S. and Canada); Numbers outside the U.S. and Canada can be found on our [Integrity Line Website](#).

By mail addressed to:

Integrity Line, PMB 3767
13950 Ballantyne Corporate Place, Suite 300
Charlotte, NC 28277 (USA)

Reports through the Integrity Line may be made anonymously. However, certain countries limit the types of reports that may be submitted through the Integrity Line (for example, some countries limit reporting to financial, accounting, auditing or bribery matters or limit anonymous reporting all together). If you report a matter that should be handled locally, you may be directed back to local management or Sealed Air's Human Resources department.

Reporting Process

When you contact the Integrity Line, the information you share will be submitted to the appropriate individuals in order for the Company to address the question or concern and investigate, as appropriate. The Company takes this process seriously and will strive to maintain the confidential nature of your report to the extent it is able, in accordance with applicable laws. Sealed Air values those who report suspected violations in good faith and is committed to protecting them from reprisal or retaliation. On the other hand, knowingly participating, concealing, or falsely submitting a report in bad faith violates our Code of Conduct and our commitment to act with integrity.





Our People Matter

Our success starts with our employees.

Our Culture

We recognize that every member of the team plays a unique and important role in the success of our organization. As employees, you help us grow and you bring diverse perspectives that solve big challenges for customers and colleagues. As a world-class global organization, our business is at its best when inclusion comes first and the fundamentals of diversity are evident in our culture.

When it comes to how we work, we recognize that it's not only about *what* we achieve, but *how* we achieve it. Through our employee core competencies and our leader behaviors, our people are driven by what is right.

Our Commitment

We are committed to providing a work environment free of discrimination, harassment, retaliation, bullying, and abusive conduct. Harassment can take many forms—including physical (such as unwanted sexual advances or contact), verbal (offensive or suggestive jokes), or non-verbal conduct (sharing an inappropriate image). Behaviors that create an intimidating or hostile work environment are not only a drain on our morale, productivity, and high-performing culture, but also violate our values and may even violate the law.

We are committed to providing employees an equal opportunity to succeed based on their performance, qualifications, skills, and talents.

We are committed to a workplace where employee health, safety, and well-being is a priority—including a workplace that is free from violence, threats of violence, and abusive or threatening behavior. We all have a responsibility to show up every day fully able to perform our jobs safely—which means never coming to work impaired or under the influence of drugs or alcohol. We operate in compliance with applicable health and safety regulations and laws, and our own policies, which may be more stringent.

We also recognize the free association and collective rights of our global workforce.

Our People Matter

You can contribute to a respectful, inclusive, and safe workplace by:

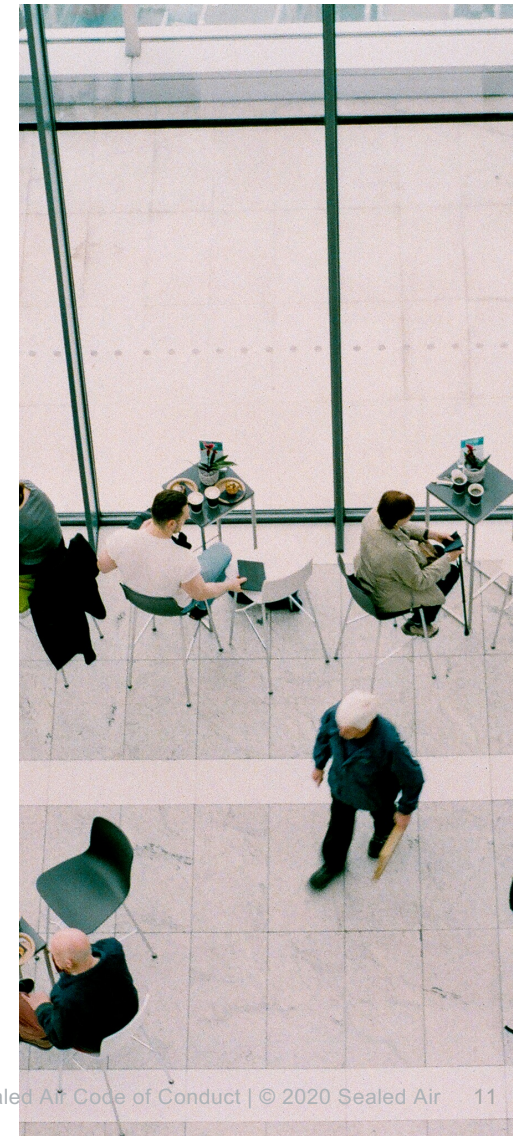
- ✓ Treating others with respect and dignity—always.
- ✓ Making considerate word choices and taking into account the perspective of the listener.
- ✓ Listening and being receptive to different points of view and ideas.
- ✓ Speaking up if you see or believe discrimination, harassment, retaliation, bullying or abusive behavior is occurring—especially if the behavior is based on characteristics protected by national or local laws including but not limited to race, origin, gender (or gender identity), age, religion, citizenship, sexual orientation, veteran status, or disability.
- ✓ Following site safety policies and protocols . . . all the time.
- ✓ Promptly alerting a company resource if you believe an unsafe working condition or situation exists that violates Sealed Air's Code of Conduct, policies, or the law.



Integrity at Work – What Should You Do?

You overheard your manager make offensive comments to a female colleague on more than one occasion but are worried your manager might reprimand you for reporting it. How should you address the situation?

Response: Raise your concerns with a Company resource. Sealed Air needs to know about this behavior because it violates the commitment we have made to provide a respectful and inclusive workplace—and it may violate the law. While the best place to start would typically be with your manager, because it is the manager's behavior that is concerning, you can contact your human resources representative, another Company resource you trust, or the Integrity Line. A reprimand or discipline (without cause or legitimate reason) because you reported the behavior is considered retaliation, which is not tolerated at our Company.





Our Relationships Matter

We value relationships that help us leave our world better than we found it.

Our Customers

From our labs and manufacturing sites, to our teams in the field, we are committed to doing what it takes to solve problems for our customers and finding better, more efficient ways of getting things done.



Product Integrity



Operational Efficiency



Package Optimization



Brand Experience

Our Shareholders

We respect our shareholders and the trust they put in us. Everything we do and every decision we make should create value for our customers, our shareholders, and our communities.


Our Business Partners

We work with different business partners around the world, and choose those who are committed to delivering value with integrity, honesty, and transparency in their operations and supply chains. This commitment extends to prohibiting and eradicating all forms of child labor, modern slavery, and human trafficking from our supply chains. If you are a Sealed Air partner, you are expected to know and follow our Code of Conduct (and any other Sealed Air policies or requirements that may apply to your organization) and hold your suppliers and sub-suppliers to those standards.

It is up to us to hold our partners accountable and ensure they operate ethically, in compliance with the law and in a way that is consistent with our Code, our policies, and our values.



Learn more: [Anti-Slavery and Human Trafficking Policy](#)



Our Words Matter

We respect the impact our words can have.

We know the words we use can affect our work environment, our morale, and our culture. Your words and actions, added to others' words and actions, create the atmosphere we work in. You are expected to be truthful, and not misleading, in your verbal and written communications and reports to the Company and others.

When you think about the impact of words, the number of ways that words can be shared, and how those words can then impact our company, you understand the value of sending a clear and consistent message.

We recognize that you are passionate about the work of Sealed Air and may want to share it with others. With respect to speaking about Company business, we have designated certain individuals to speak on behalf of our company. If you receive inquiries from third parties (e.g. the media) and you are not designated to speak on behalf of the Company, you should not engage. Direct them to Sealed Air's designated spokespeople.

We do this to protect our Company (and you) from making unauthorized public statements on our behalf. Posting information about the Company, including inaccurate or inappropriate information, could have a negative effect on our Company, our reputation, and even violate the law.

We also recognize that a substantial amount of information sharing now occurs via social media. However, we need to consider the impact our use of social media may have on the Company. Our social media policies or guidelines provide guidance on making appropriate decisions about work related social media use, postings and other internet activity, as well as responding to others in the online world about our Company. Make sure you are familiar with them.



Learn more about how to use social media appropriately [here](#).



Integrity at Work—What Should You Do?

You are contacted by a newspaper reporter about a rumor regarding a large customer deal. You think sharing this news will generate interest about the Company's growth plan. Is it a problem to share with the reporter what you know?

Response: Yes. Any information about the Company, such as a large customer deal, that has not been disclosed publicly is considered confidential information and may only be disclosed by authorized individuals of the Company. Speaking with the reporter when you are not authorized to do so can have negative consequences on the Company and can expose it to legal risks. You should not engage with the reporter. Let our designated Company spokespeople know you have been contacted and they will handle the inquiry.





Our Decisions Matter

We make objective and thoughtful decisions that go beyond compliance with our laws.

As a global Company, we are required to comply with and not take any action that would violate the laws of countries where we do business. Everyone is responsible for understanding and complying with the laws and policies where they work—including those not listed in our Code.



Our Decisions Matter



Bribery and Corruption

Bribery and corruption harm communities and the marketplace—which is why we do not tolerate it in any form.

For us, our stance on bribery is not only about complying with the law (which in many countries is considered a crime) it's about being socially responsible.

Regardless of local custom or the practices of other companies, we resist corruption in any form and vigorously oppose bribery by:

- ✓ Never offering, promising or giving anything of value to a government-official, supplier, customer, or anyone else for the purpose of gaining a business advantage. The term “anything of value” is very broad and may include small amounts or even intangible, non-monetary items such as confidential or inside information.
- ✓ Not only following the laws and requirements of the countries where you work related to bribery and corruption but avoiding behavior that gives the appearance of any improper influence or control.
- ✓ Being accurate and complete in recording all payments and expenses as required by our policies and applicable laws.
- ✓ Conducting appropriate due diligence on and communicating clear expectations to third parties—such as distributors or sales agents—doing business on our behalf.
- ✓ Not using an agent or other third party intermediary to make improper payments or payments that we would not make ourselves in the ordinary course of business.
- ✓ Diligently following applicable gifts and entertainment guidelines and our Antibribery and Anticorruption policies and procedures.
- ✓ Promptly notifying a Company resource if any activity that could be considered a bribe or an illegal kickback is suspected.

Our Decisions Matter



Bribery and Corruption (Continued)

Laws and regulations regarding bribery and corruption are growing in number and complexity.

International laws that prohibit bribery and corruption, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and similar anti-corruption laws adopted by many other countries are growing in number and complexity. Remember that anyone who finds himself or herself in a situation calling for payments that might be construed as illegal or inappropriate should always consult with a Company resource, such as the Legal Department, before taking any action. If you have witnessed or believe bribery or corruption is occurring, we need you to speak up.



Learn more: [Global Antibribery and Anticorruption Policy](#); [Travel and Expense Policy](#)



Integrity at Work – What Should you Do?

A procurement officer at one of our customers that is partially-owned by a foreign government entity asks you to help his daughter get an internship at Sealed Air. He says it could benefit the both of you. Because the internship is unpaid and only part of the customer is government owned, is it okay to help the daughter secure the internship?

Response: No, you should not offer any assistance. There are elements of this request that are not only improper, but also may be illegal. A government official can be an officer, employee or representative of a government agency or an employee of a government owned or controlled business—even if the government only owns a portion of the organization. An internship is also considered something of value regardless of whether it is paid or unpaid if it benefits the government official. Additionally, the suggestion of mutual benefit implies there is impropriety involved in exchange for the request.

Antitrust and Fair Competition

We promote and preserve a competitive global marketplace.

When we do business, we do so fairly, openly, and honestly based on the merits of our solutions. We afford our competitors and partners the degree of respect that we expect them to afford us and expect everyone to deal fairly with our customers, suppliers, competitors, and employees. Using deceptive or dishonest means to gain an improper advantage over our competitors isn't just unfair and illegal—it can have a negative impact on our market, our customers, and our communities.

Compete fairly and honestly on behalf of Sealed Air by:

- ✓ Being honest in our business dealings—including with customers, suppliers, and competitors.
- ✓ Growing our business on the basis of our innovative solutions, quality, and performance.
- ✓ Following antitrust and competition laws in the countries where we operate.
- ✓ Never discussing or entering into any agreement or understanding with a competitor, customer, or supplier to:
 - Mandate, set, or fix prices or terms related to our products;
 - Divide territories, markets, or customers; or
 - Interfere with or block any competitive bidding process
- ✓ Using competitive information from public sources and not from confidential or improper means.
- ✓ Being fair, factual, and complete in our advertising, sales, and promotional materials; and
- ✓ Never asking or encouraging employees or prospective employees to divulge confidential information from previous employers or competitors.



Integrity at Work—What Should you Do?

You see a former colleague at a trade show who now works for a competitor. She asks you how business is going and then asks about our pricing strategy given the increase in material and shipping costs. How should you respond?

Response: It is common to see former colleagues or competitors at events and while it's acceptable to respond generally that business is going well, you should not talk about our business strategies and plans with competitors. Discussing pricing and strategy could be construed as a willingness to enter into an agreement or understanding to fix prices—which could violate antitrust and competition laws. Our pricing and strategy is confidential information which should not be shared.



Our Decisions Matter

Our Decisions Matter



Insider Trading

Trading based on material, nonpublic (or “inside”) information isn’t just unethical—it’s illegal

Sealed Air is a publicly traded company. Based on your role within the organization, you may be privy to information about the Company (or other public companies that have a relationship with Sealed Air) or its customers that has not been divulged publicly. This is called inside information. You should never buy or sell securities or take advantage of the inside information that you have access to at Sealed Air.

In order to comply with insider trading laws you should:

- ✓ Never buy, sell, recommend, or trade in securities while in possession of material inside information related to the issuer of those securities; and do not provide others (including your family and friends) with inside information so that they may trade.
- ✓ Know what is considered material inside information. You should consider information to be material if a reasonable investor would consider it important in making an investment decision (for example, any information that would likely impact the market price of a security if publicly available). Examples include but are not limited to nonpublic information about mergers or acquisitions, financial or earnings results, financial forecasts, changes to the executive management team, pending lawsuits, or major agreements or customer deals; and
- ✓ Comply with any trading approval requirement, window, restriction, or special blackout period that may apply to you, and don’t make any trades until the restriction has been lifted or has been pre-approved by the Company, if required.



Learn More: [Insider Trading Policy](#)

International Laws

As a global company, we follow the laws of each country in which we do business.

These laws include but are not limited to the international trade laws that regulate the import and export of our products. If you are involved in the movement of products, services, information, or technology across international borders, make sure you know and comply with the requirements associated with the countries in which you do business. Be aware that the laws of more than one country may apply to you or your business transaction.

Your particular country or operation may have additional policies, which are designed to reinforce and supplement our corporate policies and the Code. These additional policies are important and you should familiarize yourself with them. If there appears to be a conflict between laws, customs, or local practice, seek help from the Legal Department or a member of Sealed Air's Trade Compliance team.



Find out more about our trade compliance policy [here](#).



Our Decisions Matter

Our Decisions Matter



Conflicts of Interest Appearances matter.

A conflict of interest can occur if something you do interferes with the work you do at Sealed Air, compromises your judgement, or otherwise creates an appearance that something is influencing your decisions that might not be in the best interest of Sealed Air.

It is not possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. Being able to recognize a potential conflict can help you determine when disclosure is required and how to resolve or avoid the conflict.

A conflict may occur when you:

- ✓ Supervise or conduct business with someone whom you have a personal relationship, such as a family member.
- ✓ Invest or have an ownership interest in one of our suppliers, customers, business partners, competitors, or other company that impairs your ability to make objective decisions on behalf of Sealed Air.
- ✓ Take for yourself a business or corporate opportunity meant for or pursued by Sealed Air.
- ✓ Use nonpublic Sealed Air, customer, or vendor information for personal gain or for the benefit relatives or friends (including securities transactions based on this information).
- ✓ Own or do work for a company that competes, does business, or wants to do business with Sealed Air. Serving in an advisory role or on the board of directors for such a company may also pose a conflict.

If you discover that a personal activity, investment, interest or association could compromise—or even appear to compromise—your objectivity or your ability to make impartial business decisions, disclose it to your manager, Human Resources or the Legal Department. Many conflicts can be resolved. If you are unsure whether an issue or action could be a conflict of interest or is inconsistent with our Code, you should always consult your manager, the Legal Department, or another Sealed Air resource before proceeding.



Integrity at Work—What Should You Do?

You have a family member who is a qualified candidate for a position on a team that reports up through you. You know he or she is the best candidate and want to hire the relative. Is there any issue with this?

Response: Possibly. Even though this person won't report directly to you, selecting a friend or family member from the applicant pool for a job in your department could be a conflict. It is important that you follow Sealed Air's hiring procedures to ensure that all qualified candidates are considered. Discuss the situation with your manager or human resources before proceeding.

Gifts and Hospitality

Our business relationships are based on trust and mutual value.

We understand that building strong working relationships with our customers, suppliers, and other business partners is important to our growth. Entertainment and hospitality with customers, suppliers, and other business partners is often a normal part of doing business. However, gifts or hospitality that create a sense of obligation, compromises professional judgment, or even gives the appearance of impropriety are never appropriate.

Gifts or entertainment (given or received) should:

- ✓ Have a legitimate business purpose.
- ✓ Be infrequent.
- ✓ Comply with all laws, regulations, and Company policies or approved practices which may include monetary limits pursuant to global guidelines and/or limits set by local management.
- ✓ Not knowingly conflict with the policies of the receiver.
- ✓ Be discussed and approved by your supervisor or Company representative.
- ✓ Never create a feeling of obligation, compromise your judgment, or appear to inappropriately influence you or the recipient.
- ✓ Never be requested or solicited from a customer or supplier.
- ✓ Never be cash or a cash equivalent such as a gift card, check, loan, or stock; and
- ✓ Always be recorded accurately in our books and records, as required.



Integrity at Work—What Should You Do?

A customer accompanies you to one of our manufacturing facilities to see a new production line. You had planned to take them to a sporting event with some of your other Sealed Air colleagues. Is this okay?

Response: Attending events—even purely social events—with customers or suppliers is generally not categorized as gift, but is business entertainment. As long as the entertainment aligns with our guidelines and policies, attending events with suppliers and customers is generally appropriate and a normal part of conducting business.



Our Decisions Matter

Gifts and Hospitality (Continued)

Use good judgment.

Make sure to always use good judgment and be aware of any special restrictions or requirements that may apply to you if you are offering or accepting a gift or business entertainment. For example, giving anything of value to a government official can be problematic or even illegal.

Additionally, employees who have purchasing power or are in a position to influence purchasing decisions (e.g., procurement, commercial vendor management, or division or functional leadership), or are involved in active negotiations or a bid process with a vendor or customer should generally not accept gifts and exercise additional care when accepting invitations to meals or entertainment.



Learn more: [Global Travel and Expense Policy](#); [Global Antibribery and Anticorruption Policy](#)

Additional policies or guidelines may be implemented by the Company to help you identify circumstances where a gift or hospitality is allowable and when it could be perceived as improperly influencing our decisions. Countries with greater risk may also have country procedures supplementing any global guidance. Be sure to know the standards that apply to you. And if after reviewing our Code and policies, you are still unsure about whether accepting a gift or invitation is allowable, just ask a Company resource for guidance.



Integrity at Work—What Should you Do?

A potential supplier currently bidding on an RFP you are conducting for a global contract offers you tickets to an event, but cannot attend with you. Are accepting the tickets okay?

Response: Since the supplier will not be attending with you, the tickets are considered a gift, not business entertainment. Even if the supplier was going to be in attendance, consider that the supplier is bidding for a contract. While it is a nice gesture, accepting the tickets may create a sense of obligation to select the supplier—which should be avoided.



Our Decisions Matter

Our Decisions Matter



Our Business Records

We rely on the integrity of our records to make important business decisions and know others do too.

Many people depend on our information to make important strategic decisions. Each of us has a responsibility to ensure the stringent standards, policies, and controls we have established with respect to our financial books and records are followed. From disclosure requirements, to preparing a financial statement, or simply completing your timesheet, each record or document you prepare must be honest, accurate, complete, and comply with our policies and the law. Information cannot be falsified under any circumstances.

To maintain the accuracy and integrity of our records, you should:

- ✓ Create, maintain, preserve, and dispose of all company records in accordance with the law and Sealed Air's records management or retention policies/schedules and comply with any instructions you receive from our Legal department.
- ✓ Comply with our internal processes and controls to ensure our records accurately and fairly reflect all transactions.
- ✓ Follow our [Global Travel and Expense Policy](#) to ensure all expenses have a legitimate business purpose; and
- ✓ Report any suspicious transactions or activities you believe violates our Code, policy, or the law.

While we all have a responsibility to act ethically and in accordance with the law, additional responsibilities apply to certain positions within our Finance department. Learn more about these responsibilities in our [Code of Ethics for Senior Financial Executives](#).



Integrity at Work—What Should You Do?

You are not a member of the Finance department. Is it true that you don't have to worry about maintaining accurate books and records?

Response: No, that is not true. Everyone who submits a report, form, or internal document—from expense reports and benefits enrollment to production logs and sales invoices—contributes to the accuracy of our books and records. Even if you are not in a department such as Finance, which requires greater responsibility when it comes to fiduciary record keeping, you have a responsibility to ensure that records are always accurate, honest, and complete.



Our Reputation Matters

Together we can protect what we've built.

Maintaining our reputation of integrity, credibility, and trust is vital to our business and our growth.

Poor or careless decision-making can tarnish our reputation, harm our brand, and negatively impact how we are viewed in the marketplace. But we can protect what we have built by making good decisions, safeguarding our assets such as our intellectual property and proprietary information, and demonstrating through our words and actions that our reputation is world-class.





Our Reputation Matters



Our Brand

We look, work, speak, and act as Sealed Air.

As a Company, our brand is the most valuable thing we own. Having a strong, recognized, respected brand is like having a superpower and we are all empowered to contribute to our brand through the value and service we provide. Throughout our history and continued transformation, one thing remains unchanged: the legacy of respect and credibility that we have created within our brands.

Through good decisions, we continue to build upon our legacy and ensure our brand continues to be synonymous with performance, quality, expertise, safety, flexibility, and innovation.

Our Innovations

We are in business to solve critical packaging challenges.

As a company of problem solvers and innovators, we have the ability to provide visionary thinking and foresight to our customers and the industries we serve. We are fundamentally transforming how we innovate, buy, make, and solve so that we have the agility to respond to the ever-changing needs of our customers and the confidence to lead them to what lies ahead. Together, our efforts have resulted in groundbreaking technology, products, and processes which will continue to be a platform for our innovation and growth.



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Our Information

Do your part to safeguard our information—and the information of others who entrust it with us.

Based on your role or relationship with Sealed Air, you may generate or be exposed to information or material, such as processes, technology, samples, inventions, or business plans, for which confidentiality is required. We make significant investments to develop products and intellectual property (e.g., trade secrets and patents) in order to maintain a competitive advantage.

We must each do our part to safeguard our confidential information and assets from unauthorized use, disclosure, or misappropriation, so we can maintain that advantage. Disclosures, even inadvertent, can have serious consequences for our Company, our customers, our partners, and our shareholders. While occasional personal use of these systems is permitted, we must remember that our Company reserves the right to monitor our use, except when prohibited by local law.

Protecting personal information is important to our company. We respect privacy and protect the personal data of employees, customers, and others we do business with. We recognize that personal information should be collected, stored, disclosed, transmitted, and destroyed in accordance with data privacy laws and privacy principles. Data and personal information is protected through a variety of measures, including our IT security policy and other applicable policies.



Our Information (Continued)

When we protect our assets, we protect our business.

Protect our information and the information of others by:

- ✓ Sharing confidential information only with those who have a legitimate need to know it—and if you plan to disclose such information outside Sealed Air, make sure you obtain protections and authorizations from the appropriate company resource *before* you disclose it (i.e. with a non-disclosure agreement).
- ✓ Following the processes and policies we have in place to protect our networks, computers, devices, programs, and data—including employee data—from attack, damage, unauthorized access, or disclosure.
- ✓ Using the Sealed Air name, logo, and other trademarks that comprise our brand identity in accordance with our branding guidelines.
- ✓ Using care with your email and other electronic communications. Validate senders, recipients, links, and attachments before opening or sending, and delete suspicious emails.
- ✓ Protecting the confidential information received from others that has been entrusted to us.



Learn more about how you can protect our brand, innovation, and information:

[Sealed Air Brand Resource Center](#); [IT Security Policy](#); [Acceptable Use Policy](#); [Trade Secret Policy](#)



Our Reputation Matters



Our Communities Matter

We leverage our global resources and expertise to affect positive and meaningful change for our communities.

Our responsibility as individuals to act ethically intersects with the broader purpose of Sealed Air—to leave our world better than we found it. This includes our commitment to environmental sustainability, eliminating food waste, and giving back to the communities we serve.

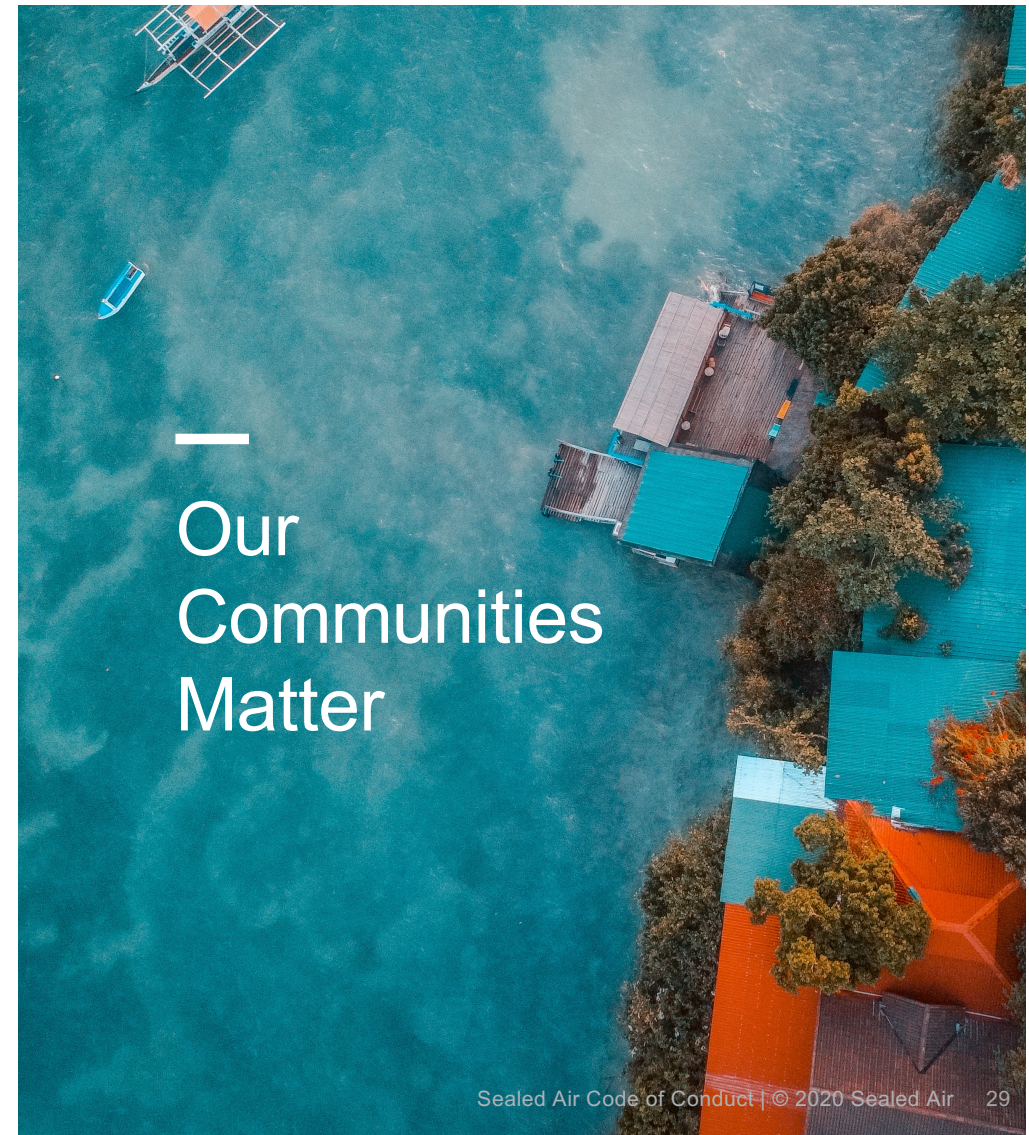
Sustainability

We create processes and solutions that help protect our planet.

We strive to leave our world, environment, and communities better than we found them by innovating differentiated, sustainable solutions. Our history of sustainability is strengthened through our sustainability and plastics pledge. As an industry leader, it is our responsibility to build a waste-free future, keep our oceans clean, and reduce our carbon footprint. Sealed Air is also focused on creating a world where people have better access to a safe, plentiful food supply where less food is wasted.



Learn more about our commitment to sustainability and our plastics pledge [here](#).





—
Our
Communities
Matter

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Community

We leave our communities better than we found them through dedication of time, talent, and resources.

Making a positive impact on the communities where our employees and customers live and work is a top priority and is one where we affect meaningful change across the globe.

We also create shared value through key partnerships with nonprofit organizations to improve food safety; to respond to disasters that affect our global communities; and to identify and implement circular economy solutions to plastics use and end-of-life management.



Learn more about our community involvement [here](#).

Personal Interest and Political Activities

We encourage our employees to get involved in the political process as private citizens.

Sealed Air supports your involvement in political activities on a volunteer basis but asks that you do so on your own time and at your own expense, making sure your activities are lawful and consistent with our policies. Sealed Air does not make political contributions and does not reimburse employees or others for contributions to political candidates or organizations.

Closing Thoughts

When reflecting on the Sealed Air Code of Conduct, we must remember that our Code is more than just words. Our Code is a representation of who we are, what we stand for, and how we act. Every day we bring our foundation of ethical behaviors to life through our words and actions; build credibility and trust with our employees, our shareholders, and customers; and deliver long-term value to the communities that we serve. We know that it matters.



Disclosures

For Employees

Nothing in this Code of Conduct or in any Sealed Air policy is intended to limit or interfere with any rights that employees may have under the U.S. National Labor Relations Act.

We strive for consistency and fairness in determining the appropriate level of discipline for violations of our Code of Conduct. Discipline may include a variety of measures as determined by the Company in its discretion up to and including termination of employment.

Nothing in the Code prohibits you from communicating with government agencies about possible violations of federal, state, or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and the Code does not require you to notify the Company of any such communications.

Your rights as an employee and our rights as an employer are governed by the laws of the country of employment, the work rules at your location and your individual written or collective employment contract, if applicable. For non-U.S. employees, to the extent that the terms of your employment are more specific than those contained in this Code, the more specific terms shall govern. However nothing in this Code is superseded or invalidated by the terms of your employment.

Questions or Concerns

If you have questions about the Sealed Air Code of Conduct, policies, or would like to report a concern, contact any of the resources contained within this Code.

Waivers of Our Code of Conduct

As a general matter, waivers of the Code of Conduct will not be granted. If and when a waiver is given, it must be in writing from the General Counsel. Any amendment or waiver of our Code for executive officers or directors may only be granted by the board of directors, or a committee of the board, and will be publicly disclosed when required by law.

Sealed Air reserves the right to recommend unilateral changes to its Code of Conduct or company policies at any time.

