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## **INTEGRITY LINE GUIDELINES & FAQ**

We understand you may have questions on how to report ethical misconduct at Sealed Air. We have created this document to provide helpful information on Sealed Air's reporting tool known as the Integrity Line.

### **Overview**

#### **What is EthicsPoint?**

EthicsPoint, or commonly referred to by Sealed Air as its “Integrity Line” is a comprehensive and confidential reporting tool to assist management and employees in reporting and addressing ethical misconduct in the workplace.

#### **Why do we need a system like EthicsPoint?**

Our ability to solve our customers' most critical packaging challenges with innovative solutions that leave our world, environment, and communities better than we found them hinges upon a culture where we are consciously committed to always do the right thing. Individuals who make us aware of possible violations of our Code of Conduct, applicable laws, or our policies play a critical role of helping us maintain these very high standards.

Moreover, publicly traded companies like ours, are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.

An effective reporting system will augment our other efforts as part of our enhanced corporate compliance program to foster a culture of integrity and ethical decision-making.

### **Integrity Line Reporting – General**

#### **May I report using either the Internet or the telephone?**

Yes. With the Integrity Line, you have the ability to file a confidential report via either the telephone or the Internet. You can file an EthicsPoint report from any computer that can access the Internet. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

## Sealed Air Integrity Line Guidelines and FAQ

### **What type of situations should I report to the Integrity Line?**

The EthicsPoint system is designed for employees to report workplace or conduct concerns including but not limited to violations of our Code of Conduct, the law, our policies or any other conduct that may contravene our values. If an employee has a specific workplace grievance that relates to the employee's terms and conditions of employment (such as discrepancies or questions about pay or benefits or issues related to individual discipline), we encourage them to contact a supervisor or designated Human Resource representative. We review all matters that are reported through the integrity line and will investigate reports confidentially, as appropriate. We also encourage our employees to report environmental, health, or safety issues (EHS) to their site management as soon as possible to ensure that the situation is addressed in a timely manner.

### **If I see a violation or am not sure if what I witnessed or heard is something that should be reported through the Integrity Line—what should I do?**

When you observe some behavior that you believe violates our Code of Conduct, any law, or Sealed Air policy, we expect you to report it. We strongly encourage you to first bring any concerns forward to your direct manager, human resources, another member of our management team, or a member of the global legal department. They often times are in the best position to address your concern, answer questions, or provide guidance in a timely manner. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner or desire to do so confidentially. It is for such circumstances that we have created the Integrity Line. Please be aware that reports made through the Integrity Line are carefully reviewed and assigned for investigation as appropriate.

### **Does management really want me to report?**

We certainly do. In fact, we *need* you to report. Corporate misconduct contravenes Sealed Air's high ethical standards. Our uncompromising approach to business depends on us to report activity that may threaten our core values and the standards we have set. Your reporting can minimize the potential negative impact on the company and our employees. Sealed Air also has a strict no retaliation policy and will not tolerate any reprisal against an employee who makes reports in good faith.

### **How much information should I provide?**

We strongly encourage you to provide as much detail and information regarding the issue as possible. Our investigators rely on detailed and accurate reports in order to conduct a thorough investigation.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

### **What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

## **Sealed Air Integrity Line Guidelines and FAQ**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions which often are necessary to ensure a complete investigation is conducted. Failure to provide enough information or respond to the company's questions may render your report non-actionable or closed for insufficient information.

### **Integrity Line Reporting Security & Confidentiality**

#### **I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

We encourage employees identify themselves when they make a report. Sealed Air has a strict no retaliation policy and does not tolerate reprisal of any kind against anyone who makes a report in good faith. Providing your name and contact details allows the investigator to contact you directly to confidentially discuss your report. However, if you wish to report anonymously, your name will not be on any report made through the website or the hotline. The EthicsPoint system is designed to protect your anonymity in jurisdictions that permit anonymous reports. Please be aware that your ability to make anonymous reports may be limited in certain countries due to local laws. Our company, however, may still request through EthicsPoint that you contact the designated investigator assigned to your case to provide more information so they are able to fully investigate your reported concern.

#### **Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery. Please be aware that your ability to make anonymous reports may be limited in certain countries due to local laws.

#### **What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish. We encourage employees identify themselves when they make a report. Sealed Air has a strict no retaliation policy and does not tolerate reprisal of any kind against anyone who makes a report in good faith. Providing your name and contact details allows the investigator to contact you directly to confidentially discuss your report.