



California Transparency in Supply Chains Act of 2010 (SB 657) Compliance Declaration

California Transparency in Supply Chains Act of 2010 (SB 657) Compliance Declaration BWAY Corporation is committed to ensuring that its products are not manufactured using child, prison, or forced labor in violation of U.S., foreign, or international laws. In support of this commitment, BWAY has taken the following steps:

Internally: BWAY ensures compliance with all laws applicable to its employees and contractors working in its facilities, including those related to child, prison, and forced labor, and maintains documentation appropriate to demonstrate such compliance. Additionally, BWAY ensures that BWAY employees directly responsible for supply chain management receive training on ethical issues, including child, prison, and forced labor, particularly with respect to identifying and responding to such issues within the supply chain.

Externally: While historically BWAY has required its suppliers to commit to comply with all laws and regulations applicable to them generally, beginning in 2012 BWAY commits to pursuing agreements with all of our direct suppliers which contain specific terms and conditions requiring them to certify that the products and services provided comply with international standards and applicable laws and regulations regarding child, prison, and forced labor. While BWAY shall not actively verify and audit supplier performance on this issue independently of other business activities, if BWAY becomes aware that any supplier has violated this commitment BWAY will escalate this issue to senior management for appropriate action.

As an ethical and business matter BWAY takes its obligation to prevent child, prison, and forced labor very seriously. BWAY will investigate any violations of the standards set forth herein and will take the appropriate action up to and including termination for employees, contractors, and suppliers.