



STATEMENT OF BUSINESS PRINCIPLES

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Pregis Corporation strictly adheres to laws governing our business and people practices. Our goal is to instill within our culture the highest ethical and professional standards. We know that integrity and excellence in these areas will lead us to success.

This Statement of Business Principles specifically outlines legal and ethical business practices that pertain to our company. Our standards of professional conduct and excellence contribute in some way to each and every section contained in this statement.

Here you will find specific examples of the standard of legal and ethical conduct that is expected from you as an employee and from the company as a whole. Responsibilities are clearly explained and guidelines are provided should you ever encounter noncompliance to these standards.

Take the time to read through this statement and consider how these standards apply to you and your role as a Pregis employee and representative. Remember that adhering to these laws and standards is the key to our success, to our reputation for excellence as a company, to ourselves, and to the world in which we live.

If you have questions or need clarification on these standards or how they apply to our business practices, contact your manager or the appropriate company authority for help and guidance.

Michael McDonnell
President and Chief Executive Officer

October, 2006

Statement of Business Principles

At Pregis, no business requirement ever justifies an illegal, unethical, immoral, or unprofessional act. Pregis holds ethics, integrity, and lawful conduct among its topmost priorities. Ethical and lawful conduct is essential to protecting Pregis's worldwide businesses and reputation. The Statement of Business Principles provides direction in areas where special care may be needed.

All supervisory employees have a special responsibility to assure ethical and lawful conduct by conducting themselves and managing their departments to the highest standards of integrity and honesty. Supervisors must annually review the Statement of Business Principles with employees under their supervision. Supervisors also must maintain a workplace environment free of the fear of reprisal, one that encourages frank and open communications concerning Pregis's expectation of ethical and lawful conduct. All supervisors will be measured on how well they accomplish these responsibilities.

Each employee, regardless of position or area of responsibility, is responsible for upholding the Statement of Business Principles in their daily activities and for seeking help when the proper course of action is unclear.

Pregis's worldwide operations must comply with all applicable laws and regulations as well as the Statement of Business Principles and the policies and procedures that support them. Pregis's Statement of Business Principles will be updated to reflect changes in laws, regulations and Pregis policies, and to incorporate employee suggestions on improving ethical and lawful conduct.

The Statement does not attempt to address every situation or answer every question. The policies and principles covered in the Statement are often directional and in many situations require an exercise of judgment. If you question whether a proposed course of action is consistent with the Statement of Business Principles, or any other requirement, seek guidance before taking any action. Generally, you should first ask your direct supervisor and others in the reporting chain. However, if you feel that would be inappropriate, you may contact the General Counsel, the Chief Human Resources Officer or the Chief Financial Officer.

To assist you in the above, Pregis has established a toll-free Hotline: You may communicate confidentially, questions concerning this Statement of Business Principles, or suspected violations thereof, by calling the toll-free, 24-hour Hotline number at:

1-877-866-7799

Outside the United States, you can make a toll-free call by following the instructions on the attached addendum.

You may also communicate your concerns by mail to:

Compliance Officer
c/o General Counsel
Pregis Corporation
1650 Lake Cook Road
Deerfield, Illinois 60015
USA

All inquiries will be answered promptly. All reports of suspected violations will be investigated promptly and fairly on a confidential basis. No employee will be subject to reprisal for reporting in good faith a suspected violation, and all appropriate steps will be taken to keep confidential the identity of the reporting employee.

At Pregis, ethics, integrity and lawful conduct are everyone's responsibility. If you are in doubt about the appropriate course of conduct in your daily business activity, or question how Pregis's standards and principles apply to a specific situation, you should ask.

[A simple, early question often clarifies and avoids potentially troubling situations.](#)

Sexual Harassment

Policy

Pregis will not tolerate any form of sexual harassment. It is Pregis's policy to provide all employees with a work environment free from sexual overtones.

Comments

Any conduct with sexual overtones is not permitted. Employment decisions will not be based on submission to, or rejection of, sexual advances, requests for sexual favors, or verbal or physical conduct of a sexual nature.

Your Responsibilities

- > Never make sexual advances toward a co-worker or to any other person you come in contact with in the course of your duties.
- > Do not make or tolerate sexual jokes, comments about a person's body, graphic statements about sexual matters, or engage in offensive behavior of a sexual nature.
- > Do not display sexually suggestive objects or pictures at work.
- > Do not ask or make comments about co-workers sexual conduct or sexual preference.
- > Never suggest or imply that an employee's job will be affected by his or her response to a sexual advance.
- > Reprisal against an employee reporting an alleged incident of sexual harassment is prohibited and will not be tolerated.
- > Report any inappropriate behavior of a sexual nature to your supervisor, local Human Resources representative, or Director, Human Resources; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Sexual Harassment, consult with the senior Human Resources representative at your location or the Director, Human Resources at 1-800-834-9441 extension 9312.

Anti-Discrimination

Policy

Pregis is firmly committed to the fair and equitable treatment of all its employees within a safe, healthy, and harassment-free work environment. Employment decisions including hiring, performance appraisals, promotions and discharge are based on an employee's qualifications, demonstrated skills, and performance without regard to race, color, sex, national origin, religion, age, disability, marital or family status, veteran status, or any other non-business related consideration. Pregis will not tolerate discrimination of any employee on such basis.

It is improper for any employee to harass another employee by creating an intimidating, hostile or offensive work environment through verbal abuse or name-calling, threats, intimidation or similar improper conduct.

Comments

This policy applies worldwide to all employees. In some locations, local statutory requirements may require employers to conform to locally mandated norms.

Your Responsibilities

- > Do not make or tolerate jokes, comments, remarks or treat any employee differently because of his or her race, color, sex, national origin, age, religion, disability, marital or family status, veteran status, or any other non-business related consideration. Doing so is discriminatory.
- > Create an atmosphere free of any suggestion of discrimination or harassment.
- > Notify your local management, Human Resources representative, or the Director, Human Resources of any violation of this policy; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Anti-Discrimination, consult with the senior Human Resources representative at your location or the Director, Human Resources at 1-800-834-9441 extension 9312.

Workplace Standards

Policy

Pregis is committed to fair labor practices, including laws that protect rights of workers. Pregis employees must adhere to fair employment practices.

The safety and security of Pregis employees and others while engaged in Company business, on or off Company-owned or leased property, is very important. Threats, threatening behavior, acts of violence, or any related conduct which disrupts another's work performance or the Company's ability to execute its mission will not be tolerated.

Comments

Pregis is firmly committed to having all of its employees work in a safe, healthy, and harassment-free work environment. Employees will be employed voluntarily, legally compensated, and will not be exploited.

Threatening or violent behavior includes assaults or physical violence, verbal threats or animated gestures that threaten to cause physical harm, intimidating behavior that creates an abusive work environment, possession or use of a weapon, etc.

Your Responsibilities

- > Comply with Pregis's Workplace Standards Policy.
- > Do not threaten either verbally or physically.
- > Do not foster or create an abusive work environment.
- > Do not possess weapons of any kind while on Company-owned or leased property or while on Company business (except for security personnel).
- > Report any activities that appear contrary to these standards to the Director, Human Resources or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Workplace Standards, consult with the Director, Human Resources at 1-800-834-9441 extension 9312.

Prohibited Substances

Policy

Pregis is firmly committed to the fair and equitable treatment of all its employees within a safe and healthy environment. The use, sale, possession, manufacture, dispensing, or distribution of unauthorized drugs or controlled substances by an employee, while performing Pregis business or on Pregis premises, is forbidden.

The abusive use of legal drugs or reporting to work under the influence of a legal drug that impairs the employee's ability is also forbidden. Pregis retains the right to search any and all Pregis property at any time. Controlled, prohibited, or illegal substances will be confiscated by Pregis and, where appropriate, turned over to the authorities.

The consumption of alcohol in any situation that might impair an employee's ability to perform assigned duties is prohibited. Reporting to work under the influence of alcohol is forbidden. At no time may alcohol be consumed in

automobiles or trucks used for Pregis business. Employees may not drive while under the influence of alcohol, as defined by local law, while on Pregis business. Alcohol may not be consumed, sold, or possessed on Pregis premises except as permitted by management.

Your Responsibilities

- > Do not bring illegal drugs or alcohol onto Pregis property.
- > Never use prohibited or controlled substances, or alcohol while in vehicles owned, leased or used for Pregis business.
- > Do not perform Pregis business or be on Pregis premises while under the influence of any illegal drug or alcohol. This could affect the safety of the people around you and affect the efficiency of Pregis's operations.
- > Report any violation of Pregis guidelines or procedures pertaining to prohibited substances to local management and/or your local Human Resources representative; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Prohibited Substances, consult with the Human Resources representative at your location or the Director, Human Resources at 1-800-834-9441 extension 9312.

Conflict of Interest

Policy

All Pregis employees are prohibited from taking any actions that would create a conflict of interest with the Company and should avoid even the appearance of a conflict of interest. Company resources are to be used only for approved purposes. An employee's primary work obligation is to Pregis.

Comments

A conflict of interest is a situation in which an employee's personal interest or benefit interferes with his or her responsibilities as an employee of Pregis.

Employees must not accept payments, gifts, entertainment, or other favors that go beyond the common courtesy usually associated with good business practice or that might be regarded as placing themselves under some obligation to a supplier or customer.

Unless approved in advance, no Pregis employee may hold a position with, or have a substantial financial interest in, any business that conflicts with or might appear to conflict with that employee's work on behalf of Pregis. Likewise, prior approval is required for a Pregis employee to conduct business with a company for personal benefit or for the benefit of a relative.

Your Responsibilities

- > Place compliance with laws and ethical principles above private gain.
- > Do not solicit or accept anything of more than minor value from business suppliers.
- > Do not have a position with, nor financial interest in, another business that interferes or appears to interfere with Company duties or responsibilities, unless approved in advance by the Office of General Counsel or Office of the Chief Human Resources Officer.
- > **Do not conduct/transact** Company business with a relative unless it is approved by the Office of General Counsel or the Chief Human Resources Officer in advance. All employees must maintain impartiality and high standards of conduct for honesty and fairness.
- > Disclose any substantial financial interest in or position with any competitor.
- > Report suspected violations of conflict of interest procedures to the Chief Human Resources Officer; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Conflict of Interest, consult with the Director, Human Resources at 1-800-834-9441 extension 9312.

Outside Employment & Activities

Policy

A full time employee's primary work obligation is to Pregis. Outside activities, such as a second job or self-employment, must be kept totally separate from Pregis employment and not interfere with Pregis job responsibilities or performance.

Comments

Pregis respects the privacy of every employee in the conduct of his or her personal affairs. No Pregis employee may run a personal business on Pregis time or using Pregis resources. Similarly, no Pregis employee can allow such outside activities to detract from his or her job performance or require such long hours that the outside activity adversely affects the employee's physical or mental effectiveness. Generally, no Pregis employee can perform services for, nor serve as an employee, consultant, officer or director, of any competitor, customer, or supplier of Pregis.

Your Responsibilities

- > Do not use Pregis time or resources for personal or outside business matters.
- > Do not work on behalf of competitors, suppliers, or customers of Pregis without prior authorization by Pregis.
- > Inform your supervisor, the Director, Human Resources, or the Office of General Counsel of any outside business position (other than charitable, educational, or religious) that might be viewed as conflicting with your Pregis duties or responsibilities. You may also anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Outside Employment and Activities, consult with the Director, Human Resources at 1-800-834-9441 extension 9312 or the Office of General Counsel at 1-800-834-9441 extension 9310.

Dissemination of Corporate Information

Policy

Pregis employees must not respond to requests for financial or business information about Pregis from outside sources such as the media, press, financial community, investors or shareholders or the public, unless authorized to do so. Such inquiries are to be referred to the Chief Financial Officer.

Your Responsibilities

- > Refer requests for information of any type to Corporate Communications for handling and reply.
- > Refer inquiries regarding current or former employees, other than by the news media, to the Human Resources department. News media inquiries should be referred to Corporate Communications.

Comments

Pregis will maintain a coordinated and consistent posture in its relations with the various segments of the news-gathering industry. All contact with news media concerning the affairs of Pregis, financial or otherwise, including written and oral communications and the release of photographs, must be coordinated through **Corporate Communications**. Confidential Pregis information should be released only to Pregis employees, agents or representatives on a need-to-know basis. For criminal and civil liability relating to disclosure of material non-public Company information to others who might trade in the Company's securities, see "Insider Trading."

For further information on the Dissemination of Corporate Information, consult with the Chief Financial Officer at 1-800-834-9441 extension 9320.

Protection of Pregis Property & Information

Policy

Pregis employees are responsible for protecting Pregis-owned or Pregis-leased property and equipment. This responsibility extends not only to tangible assets such as money, physical materials, and real property, but also to intangible property, such as business plans, trade secrets, computer programs, technologies, and other confidential or proprietary information of customers and suppliers.

It includes information developed by employees and may include information received from outside the Company. It may consist of financial, commercial or technical data, or may relate to payroll, salaries, benefits or personnel records. It may include information about employees, customers, potential customers or shareholders, or information owned by others entrusted to the Company.

Your Responsibilities

- > Exercise appropriate care, custody and control over Pregis property (including supplies, equipment, facilities, files, documents, films, and electronically-recorded data or images). Additionally, exercise appropriate care, custody and control over Pregis's intangible properties (including business plans, trade secrets, compliance programs, technologies, and other confidential or proprietary information).
- > Do not use Pregis's equipment; including computers, for excessive personal use and/or to browse unauthorized web sites.
- > Do not duplicate proprietary or trademarked software for personal use.
- > Keep confidential information stored properly when it is not being used.
- > Suggest improvements for the maintenance or security of Pregis property.
- > Report any theft or misuse of Pregis property to your supervisor or the Director, Human Resources; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Pregis Property, consult with the Director, Human Resources at 1-800-834-9441 extension 9312.

Comments

Pregis property, generally, must not be used for any purpose other than for Pregis business. Employees must not borrow, give away, loan, sell, or otherwise dispose of Pregis property regardless of conditions without specific authorization. Reasonable precautions must be taken against theft, damage, or misuse of Pregis property.

Electronic Communication **(Use of Computers, Internet, Email, Etc.)**

Policy

The Company's computer systems and electronic communications, in all forms, are for the benefit of the Company and are intended to be used primarily for business purposes. Such usage shall be subject to, and consistent with, all other Company policies and practices, including those prohibiting discrimination, harassment and use of Company assets to conduct personal business. It is the responsibility of each user to ensure that these technologies are used for proper business purposes in a manner that maintains the confidentiality of Company, proprietary or other sensitive information. All information transmitted by, received from, or stored in these systems is for the benefit of, and belongs to, the Company. Accordingly, users have no right of personal privacy in connection with the use of any systems or the information transmitted, received or stored on these systems, including deleted messages or files.

Incidental personal use appropriate to a business environment that does not interfere with an employee's productivity, or add additional Company expense, may be permitted.

Comments

This policy applies worldwide to all users of the Company's global electronic communication and computer systems. In some locations, local statutory requirements may require employers' users to conform to locally mandated norms.

Your Responsibilities

- > Do not expect electronic messages to be private or confidential.
- > Do not use these systems to solicit or communicate in a manner which would violate this or other Company policies or procedures, including communicating discriminatory or harassing statements, pornographic material, inappropriate humor, solicitations regarding political or charitable matters, or for any illegal purposes.
- > Create messages with the general expectation that these may be made public or otherwise used in legal proceedings.
- > Use good judgment in using these systems and exercise the same judgment in creating electronic messages, as you would use in paper documents.

Notify your local management or human resources representative of any suspected violation of this policy; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Electronic Communication, consult with the Director, Human Resources at 1-800-834-9441 extension 9312.

Antitrust

Policy

Pregis will not engage in practices that limit competition such as price fixing and division of markets. Nor will Pregis engage in practices to unlawfully restrict a competitor's opportunities.

Comments

Free competition is healthy for business and good for consumers. The antitrust laws of the United States and the competition laws of other countries govern the day-to-day conduct of business in setting prices and other aspects of the purchasing and marketing of goods and services. These laws protect consumers from illegal competitive actions such as price fixing and division of markets. It is vital to follow the laws of the United States and other countries that prohibit practices undermining competition. Pregis will compete solely on the merits of its products and services. Pregis will succeed by satisfying its customers' needs, not by unlawfully limiting a competitor's opportunities.

Antitrust laws generally prohibit entering into any kind of agreement or understanding (even oral or informal) with a competitor regarding:

- Prices, costs, profits, margins, inventories, or terms and conditions of sale;
- Territories;
- Limitations on products or services;
- Production facilities, volume, or capacity;
- Market share;
- Customer or supplier allocation or selection;
- Distribution methods;
- Any action that affects, limits, or restricts competition;
- Confidential or proprietary information;
- Bidding arrangements;
- Resale price maintenance schemes;
- Exclusive dealings.

DON'T BE MISLED into thinking that agreements are unlawful only if a written document is signed by the parties involved. If competitors make a conscious commitment to a common course of anti-competitive action, they can be in violation of competition laws. A court or jury may even infer that an informal agreement existed simply because of suspicious parallel activities by competitors following meetings or communications. The best policy is to avoid communication with competitors in any of the areas previously mentioned.

Pregis, acting independently, is free to price our products and services as we choose. However, we must avoid maintaining or expanding our market share through illegal or restrictive practices. Competition laws are complex. If you are uncertain whether any proposed pricing or marketing plan is lawful, you should consult with the General Counsel in advance.

Your Responsibilities

- > Never agree with competitors to fix prices or divide markets.
- > Never enter into any understanding with a competitor that restricts either party's discretion to manufacture any products or provide any service, or that limits selling to, or buying from, a third party.
- > Never, without first consulting the Office of General Counsel, enter into any understanding with a customer that might:
 1. Restrict a customer's discretion to use or resell one of the Company's products;
 2. Condition the sale of a product or service on the customer's purchase of another product or service from the Company.

> Contact the Office of General Counsel for prior approval before any meeting with a competitor. If you attend a trade association meeting and competitors are present, never discuss at the meeting or at any social gathering prices, costs, sales, profits, market shares, or other competitive subjects. If such matters enter into the discussion, stop the discussion, or leave the meeting or social gathering, and notify the General Counsel.

> Report any activities by co-workers or competitors that appear contrary to the antitrust laws to the Office of General Counsel; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Antitrust, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Foreign Corrupt Practices Act

Policy

Pregis, all its employees worldwide, and its joint venture partners, agents, distributors, and other representatives must comply with the Foreign Corrupt Practices Act.

Comments

This Act prohibits payments or offers of payments of anything of value to foreign officials, foreign political parties, or candidates for foreign political office in order to obtain, keep, or direct business. Indirect payments of this nature made through an intermediary, such as a distributor or sales representative, also are illegal.

This Act also requires that Pregis maintain a system of internal accounting controls and keep accurate records of transactions and assets.

The following activities are prohibited:

- maintaining secret or unrecorded funds or assets;
- falsifying records;
- providing misleading or incomplete financial information to an auditor

Your Responsibilities

- > Comply with Pregis procedures and act ethically and with integrity and the highest standards.
- > Do not make any corrupt payment, regardless of amount, to foreign government officials or personnel directly or through an intermediary.
- > Do not use Pregis assets for any unlawful or improper use.
- > Do not create or maintain a secret or unrecorded fund or asset for any purpose.
- > Comply with Pregis accounting policies and internal control procedures.
- > Do not make any false or misleading entries in Pregis records or make any payment on behalf of Pregis without adequate supporting documentation.
- > Report any suspect payments to foreign officials, political parties or candidates for foreign political office or violations of Pregis financial and accounting policies to your supervisor or the Vice President and Controller; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on the Foreign Corrupt Practices Act, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Foreign Economic Boycotts

Policy

U. S. laws prohibit participating in or cooperating with illegal economic boycotts supported by foreign nations, such as the Arab boycott of Israel. Pregis, all its employees worldwide, and its joint venture partners, agents, distributors, and other representatives will strictly comply with U.S. "anti-boycott" laws and policies.

There are many other prohibited activities. Be alert to the possibility that boycott related provisions can appear in the "standard" language in documents such as contracts, letters of credit, and shipping documents. Because this is a complex legal area, if you identify or receive any boycott-related language or request, report it to your supervisor or the Office of General Counsel. The law also requires that requests to take boycott-related actions (including requests to provide information or to agree to boycott-related terms) be reported to the U.S. Government.

At present, the following countries participate in the Arab Boycott of Israel: Bahrain, Iraq, Kuwait, Lebanon, Libya, Oman, Qatar, Saudi Arabia, Syria, United Arab Emirates, and Yemen. In addition, certain other countries, including Jordan, Iran, Sudan, Malaysia, Indonesia, Pakistan, and Bangladesh, sometimes impose restrictions on trade with Israel. This list is subject to change, so check with the Office of General Counsel regarding a current roster.

Your Responsibilities

- > Do not refuse (or agree to refuse) to do business with Israel, other boycotted countries, or blacklisted persons or companies.
- > Do not furnish (or agree to furnish) information or certifications regarding employees' race, religion, sex, national origin, or business relationships with Israel or blacklisted companies. Remember that these requests may be hidden in the fine print of contracts, or other documents.
- > Report any boycott requests or violations to the General Counsel; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Foreign Economic Boycotts, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Exports & International Trade Restrictions

Policy

Pregis's worldwide operations require an awareness of international trade laws. Pregis, all its employees worldwide, and its joint venture partners, agents, distributors, and other representatives will comply with these laws, including U.S. trade sanctions, economic embargoes, and export and re-export controls.

Comments

The export of goods and technology (including transfers with no sale) from the United States is regulated by a number of very complicated laws and regulations. There are many factors in determining whether a product or technology can be exported, including the nature of the item, the country of destination, and the end-user or end-use. Export restrictions apply not only to the export of goods and services, but also to the licensing of software and the transfer of technology in many forms, such as plans, designs, training, consulting, and technical assistance. These

restrictions can also apply to foreign-made products based on U.S. technology or that contain U.S. parts or components. Exporting goods or technology without the appropriate government approvals can result in the loss of export privileges and can subject a company to both civil and criminal penalties.

The United States generally prohibits or restricts all trade, investment and transactions involving the following countries: Cuba, Iran, North Korea, Sudan and Syria. This list changes regularly, so check with the Office of General Counsel regarding an updated list.

Your Responsibilities

- > Be familiar with U. S. export control laws, trade sanctions, and embargoes if you work on programs involving international trade.
 - > Maintain complete and accurate records of international transactions.
 - > Consult the Office of General Counsel anytime you are dealing with a product or technology intended for export. You must have the necessary government approvals before proceeding with the export.
- > Accurately complete any export control document.
 - > Watch out for transactions that could be a "cover" for prohibited sales by diverting the goods through various corporations or countries not subject to restrictions.
 - > Screen all international transactions to ensure against dealings with any individuals or entities on lists of proscribed parties maintained by the U.S. Government.

For further information on Exports and International Trade Restrictions, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Financial Controls & Records

Policy

A variety of laws require Pregis to record, preserve, and report financial information to investors and government agencies. This information must present fairly Pregis's financial position and the results of Pregis's operations. Pregis employees involved in preparing, processing and recording such information will be held responsible for its timeliness, completeness and accuracy.

Comments

Employees must record financial information accurately, completely, and timely in accordance with U.S. generally accepted accounting principles, unless local regulations require records to be kept in accordance with local accounting principles. In any event, Pregis accounting and financial procedures should be used for financial reporting to Pregis. Where U.S. generally accepted accounting principles and local requirements differ, consult with your local headquarters for guidance. Financial information must be kept confidential and released only with proper authorization.

Your Responsibilities

- > Make appropriate and timely entries in Pregis's books and records to record all transactions.
- > Do not make an inaccurate, false, or misleading entry in Pregis books and records.
- > Do not make or approve payments without adequate supporting information or if any part of the payment is to be used for any purpose other than the purpose described in the supporting documentation.

If you participate in the preparation of financial reports, know and follow Pregis's accounting and internal control procedures.

Report any inaccurate, false, or misleading records to your supervisor, the Vice President and Controller, the Chief Financial Officer or the Office of General Counsel; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Financial Controls and Records, consult with the senior financial person at your location or the office of the Chief Financial Officer at 1-800-834-9441 extension 9320.

Insider Trading

Policy

U. S. federal securities laws make it illegal to trade or "tip" others to trade in Pregis securities or the securities of other companies if you have "material" non-public "inside" information about these companies.

Comments

Information is material if it is important enough to influence someone to buy, sell or hold securities. It is illegal to buy or sell securities of Pregis or any other company if you have material nonpublic information, or to provide such information to others who might use it to buy or sell securities. This includes citing material non-public Company information on any public computer site.

Your Responsibilities

- > Never buy or sell securities of Pregis or securities of any other company based on material information that has not been released to the public.
- > Never provide material information about Pregis to others who might buy or sell securities based on that information.
- > Do not trade if you are in doubt as to whether such information has been released to the public (in general, wait at least one full business day after a Pregis press release is issued before buying or selling securities).
- > Help ensure that confidential Pregis information (such as significant new contracts, acquisitions, etc.) is released only to Pregis employees or agents and representatives who have a need to know the information.
- > Report to the General Counsel if you know or suspect that others are trading in securities based on inside information; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Insider Trading, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Political Contributions & Activities

Policy

Pregis employees are encouraged to vote in government elections and to participate in the political process. These activities must be undertaken on employees' own time and expense.

No corporate contributions or assets may be used to support specific issues, candidates, or political parties without the approval of the General Counsel.

Comments

Pregis employees are encouraged, as individuals, to express their views on government, legislation and other matters of local and national interest. You are encouraged, as individuals, to make contributions supporting candidates or parties of your choice. These activities, however, must be undertaken on your own time and at your own expense.

Your Responsibilities

- > Know and Obey restrictions imposed by law upon personal and corporate participation in politics.
- > Pregis's contact with public and elected officials is regulated by a variety of laws and regulations. Any dealings with these officials regarding Pregis must be coordinated with the General Counsel.
- > Never represent your personal political activity as being Pregis's.
- > Never use Pregis assets or employees in support of political activities without approval of the Office of General Counsel.
- > Report any activities that appear contrary to these standards to the General Counsel; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Political Contributions and Activities, consult with the Office of General Counsel at 1-800-834-9441 extension 9310.

Health & Safety

Policy

Pregis values its people and is committed to providing and maintaining a safe and healthy work environment. All employees must be responsible for knowing and complying with safety policies and regulations.

Comments

Employees must know, understand, and comply with Pregis's safety rules and regulations. They must know that no task is more important than their personal safety and that of their fellow employees. Following these requirements helps ensure not only your safety, but also the safety of others.

For further information on Health & Safety, consult with the Health & Safety coordinator at your location or contact the Corporate Health and Safety Department at 1-800-834-9441 extension 9365.

Your Responsibilities

- > Always comply with your facility's health and safety rules and procedures.
- > Always take appropriate safety precautions, including wearing and using protective safety equipment including seat belts while driving or riding in company vehicles.
- > Never compromise your personal safety procedures.
- > Always be sure of the "safe way" to perform a task. If unsure, ASK!
- > Report to your supervisor or the facility Health and Safety Coordinator any hazardous conditions, improper use of safety equipment, or any failure to follow safety procedures; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.
- > Report any job-related "near-miss," injury or illness to your supervisor as soon as possible.
- > Participate in your facility's safety program. Suggest ways to improve Pregis's health and safety procedures.

Environmental Stewardship

Policy

Pregis is committed to responsible environmental behavior. Pregis will conduct business with respect and care for the environment and the communities in which we work.

Comments

Pregis will implement responsible programs and processes to eliminate and/or minimize environmental incidents.

We will respond quickly and effectively to any environmentally-related incidents resulting from our operations and will provide information and leadership to our local communities to improve emergency preparedness.

When it is financially and technologically feasible, material will be reused and/or recycled to minimize the need for treatment or disposal to conserve resources. Where waste is generated, it will be handled and disposed of safely, responsibly, and in conformance with applicable regulations.

Your Responsibilities

- > Understand and follow Pregis environmental policy, procedures, and principles.
- > Understand the specific environmental requirements for your job function.
- > Conduct all activities in accordance with applicable environmental laws, regulations, permits, and Pregis and facility policy.
- > Ensure that environmental records, documents, and labels are complete, accurate, and truthful.
- > Handle, store, and dispose of hazardous materials using identified methods and practices.
- > Report immediately to your supervisor or local Pregis environmental representative leaks, spills or releases or any potential or suspected violation of environmental guidelines; or you may anonymously report suspected violations by calling the Company's toll-free Hotline.

For further information on Environmental Stewardship, consult with the environmental representative at your location or contact the Environmental Department at 1-800-834-9441 extension 9365.

Summary

These summaries set forth the basic expectations and general principles guiding how Pregis does business, and give advice on where to turn for additional information or whom to call to ask questions or report questionable conduct. *The most important thing to remember is that if you have a question, it is always better to ask before you act.* The first person to ask is your direct supervisor. If your supervisor doesn't know the answer, he or she has the responsibility to find the solution and explain it to you.

If for some reason you do not feel comfortable talking with your supervisor, call the Pregis Hotline number at 1-877-866-7799.

Outside the United States, you can make a toll-free call by following the instructions on the attached addendum.

or write:

Compliance Officer
c/o General Counsel
Pregis Corporation
1650 Lake Cook Road
Deerfield, IL 60015
USA

Pregis's customers and suppliers may also call the Hotline or the officers listed. All appropriate steps will be taken to keep calls and letters confidential and may be made anonymously. The identity of a person contacting the Hotline will not be given to anyone except as required by law or as needed for investigative purposes. The Company will not tolerate any retaliation against any employee who, in good faith, communicates concerns or suspected violations.

Actions contrary to the Statement of Business Principles are, by definition, harmful to Pregis and its reputation. Violations, even in the first instance, may result in disciplinary action up to and including dismissal. Pregis's Statement of Business Principles is not an employment contract, and compliance with the Statement does not create a contract for continued employment.

ADDENDUM

PREGIS HOTLINE INFORMATION

To communicate questions or suspected violations of Pregis's Statement of Business Principles, call the toll-free Hotline:

Within the United States

Dial **1-877-866-7799**

Outside of the USA

1. Make sure you have an outside line.
2. Enter the Access Code for the country you are in from the list below.
3. A voice prompt or an operator will ask you for the number that you are calling.
4. Provide the Hotline number (877-866-7799) without the preceding "1"
5. You will automatically be connected with the Pregis Hotline operator.

U.S. Access Code by Foreign Country

Country	Domestic #	Access Code
Belgium	866-274-3805	088-100-14
Bulgaria	866-659-2105	00-800-1010
Czech Republic	866-274-5183	0042-087-187
Egypt	866-274-5597	794-6222
France	866-274-7557	0800-99-0087
Germany	866-275-7998	0800-888-0013
Hungary	866-275-9781	06-800-01-877
Italy	866-772-0454	800-172-405
The Netherlands	866-772-0834	0800-022-9119
Poland	866-772-0913	00-800-111-3115
Spain	866-772-9879	900-99-0013
United Kingdom	866-772-9942	(cable/wireless) 0500-890-877 (British Telecom) 0800-890-877
Mexico	866-772-0835	(Mexico City) 001-800-877-8000 (outside Mexico City) 95-800-877-8000