

Workplace Violence Policy

1.0 PURPOSE

1.1 Packaging Corporation of America (PCA) has a vital interest in ensuring the health and safety of its employees and the maintenance of a safe work environment. PCA is committed to protecting its employees and others in the workplace from violence and from threatening behavior. PCA has established a policy strictly prohibiting violence in the workplace.

2.0 SCOPE

2.1 All employees of PCA including independent contractors, temporary employees and interns, as well as customers, vendors and visitors shall adhere to this policy.

3.0 POLICY

- 3.1 Any type of violent, threatening or intimidating behavior which arises out of employment, occurs during the course of employment, occurs at the workplace, or otherwise has a connection with employment or the workplace is strictly prohibited. Any person who violates this policy will be subject to disciplinary action, up to and including discharge. Violators may also be subject to criminal prosecution.
- 3.2 The types of conduct which are prohibited are defined as follows:
 - 3.2.1 Assaults or violence of any kind, including but not limited to hitting, kicking, scratching, pinching, or biting.
 - 3.2.2 Threatening to physically harm another person or to engage in any other type of violent act.
 - 3.2.3 Threatening or intimidating behavior which interferes with another's work performance, creates an abusive work environment, or disrupts operations.
 - 3.2.4 Possession, except as restricted by state law, or use on company property of a firearm or other weapon by any person [other than (i) an authorized law enforcement officer; (ii) a member of corporate security or a security guard authorized to carry a firearm].
 - 3.2.5 Intentionally damaging company property or property of another on workplace premises.

4.0 REPORTING CONCERNS

- 4.1 Every employee has an obligation to report conduct in the workplace that is reasonably believed to be suspicious or dangerous, regardless of the alleged offender's identity or position. Reports can be made to any supervisor, manager, or HR Representative. In addition, PCA requires any supervisor or manager identifying a troubling situation consult with an HR Representative for guidance.
- 4.2 No employee will suffer any adverse employment consequences for making a good-faith complaint or assisting in an investigation. However, the bad-faith making of a false complaint or the failure to cooperate in an investigation will subject an employee to discipline, up to and including termination.
- 4.3 Coercion or intimidation of, or retaliation against, an employee for making a complaint or assisting in an investigation is prohibited. Any employee engaging in such conduct will be subject to discipline, up to and including discharge.

5.0 ADMINISTRATION AND COMPLIANCE

- 5.1 Upon receipt of a complaint, a committee composed of representatives from the Corporate Security, HR and legal departments and outside resources as needed shall be responsible for coordinating an investigation and for taking appropriate action based upon the results of the investigation.
- 5.2 The investigation will be conducted in a confidential manner, consistent with the limited disclosure needed for a thorough investigation. All employees are expected to cooperate fully in the conduct of any such investigation, which may include personal and property searches for weapons or other evidence. No searches of an employee's person will be conducted without the employee's consent. However, consent to searches for weapons or evidence of violations of this policy is required as a condition of employment, and an employee's refusal to consent may result in disciplinary action, up to and including discharge.

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