

CODE OF BUSINESS CONDUCT



ONE ANCHOR

TABLE OF CONTENTS

Board of Directors	2
From the desk of Nipesh Shah, President & CEO	3
Anchor Glass Container Corporation - Our Guiding Principles	4
Introduction to our Code of Business Conduct	5
ONE ANCHOR - How we treat each other	8
ONE ANCHOR - How we act in the best interest of our company	10
ONE ANCHOR - How we treat our Customers	14
ONE ANCHOR - How we treat our Suppliers	16
ONE ANCHOR - How we treat our Investors	17
ONE ANCHOR - How we treat our Communities and our world	18

BOARD OF DIRECTORS



Nipesh Shah
Director
Anchor Glass Container Corporation



Tom Kichler
Chairman
CVC Capital Partners



James Christopolous
Director
CVC Capital Partners



Aviva Schneider
Director
CVC Capital Partners

FROM THE DESK OF NIPESH SHAH PRESIDENT & CEO

Dear Colleagues:

As Anchor Glass embarks on the journey to excellence, we will not compromise on our expectations and commitment to integrity. We must stay focused on integrating Anchor's guiding principles. Our Code of Business Conduct is a roadmap to help us navigate the operating environments in our business.

We have a responsibility to conduct ourselves with the highest levels of integrity in every aspect of everything we do. Our integrity helps ensure that we continue to sustain the credibility of our brand and our reputation.

Our Code and our guiding principles apply to everyone and unite us as One Anchor. Take the time to read through Anchor's Code and understand it. If you have any questions about our Code, or need help understanding how it applies to the work you do, please take the time to seek advice from any of the resources listed.

Our Company will never tolerate retaliation against anyone for asking questions or raising concerns in good faith, so you can always feel comfortable coming forward.

It is our expectation that any violations of the Code or bad behavior should be raised through one of the reporting channels.

I'm counting on you to uphold our continued commitment to integrity at Anchor.

Sincerely,

Nipesh H Shah
President and CEO



OUR GUIDING PRINCIPLES

INTEGRITY



We will always act with integrity and “do the right thing even when no one is looking”.

CONTINUOUS IMPROVEMENT



We are constantly committed to do things better for our customers, employees, investors and community.

OWNERSHIP



We will always think and act like owners. We will always put Anchor Glass’s interests ahead of individual and department interests.

TEAMWORK



We will always treat others with dignity and respect and act with humility.

ACCOUNTABILITY



We will do what we say and meet our commitments.



INTRODUCTION TO OUR CODE OF BUSINESS CONDUCT

The Code of Business Conduct (the “Code”) of Anchor Glass Container Corporation (“Anchor” or “Company”) is designed to provide guidance to each of us regarding Anchor’s standards of integrity and compliance in all our business dealings. Our Code is an integral element of the Anchor’s guiding principles. It provides guidance to all employees in areas of critical importance, and reaffirms our commitment to the highest personal and corporate standards of business conduct and ethics. Our Code defines what Anchor expects from each of us and how we treat:

- Each other
- Our Company
- Our Customers
- Our Suppliers
- Our Investors
- Our Communities and our world

What Anchor Expects from Each of Us: Our Company’s performance starts with each of us. We are essential to our company’s character and central to its leadership and success.

Who Must Follow Our Code: Our Code applies to all employees and Anchor’s Board of Directors. Where appropriate, business partners working on our Company’s behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Anchor, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Anchor policies and applicable laws and regulations.

Our Shared Obligations: We all have a personal responsibility to know and follow the Code and other Company policies, procedures and guidelines that apply to our job responsibilities at Anchor. We must never ignore or seek to circumvent the Code for any reason. If you need help understanding our Code or a specific policy, procedure or guideline, or how they apply to your scope of responsibilities, seek guidance from any resource listed in the “Asking for Advice and Voicing Concerns” section of this document.

Additional Obligations for Managers, Supervisors and Senior Leadership Team: Anchor managers, supervisors and senior leadership team have a special duty to foster a culture of integrity and compliance. This means that they should serve as role models for integrity and compliance in all of their interactions. It also means that they should ensure that colleagues who report to them feel comfortable raising questions and concerns without fear of retaliation, that any concerns or questions will be addressed in a professional and timely manner, and that we will not compromise our standards of integrity and compliance to obtain business results.

Promotions are a privilege only extended to those who exemplify Anchor’s guiding principles and values in a manner consistent with this Code.

Waiver of our Code: In extremely rare circumstances, Anchor may find it appropriate to waive a provision of our Code. Approval of any action not compliant with this Code must be sought in advance and may be granted only by the Chief Executive Officer (CEO). Any waiver for the CEO will require the pre-approval of the Board of Directors and will be promptly disclosed when required by regulation or law. When a waiver is granted, the Board or responsible Committee shall ensure that appropriate controls are in place to protect the Company.



INTRODUCTION TO OUR CODE OF BUSINESS CONDUCT

Complying with the Law: Although our Code addresses some of the familiar challenges that companies like Anchor face, it cannot address every situation that may arise in our workplace. When in doubt as to whether an activity is proper, you should seek guidance through one of the avenues discussed in the “Asking for Advice and Voicing Concerns” section. We must take care to familiarize ourselves with the policies, procedures and laws that apply to our particular job functions and locations in which we operate. If a local law conflicts with our Code, comply with local law. If a local custom or practice conflicts with our Code, comply with the Code.

Our Code attempts to clarify Anchor’s rights and expectations as an employer, but does not create any contractual employment rights for employees. Employment by Anchor is considered “at-will.” This means that you have the right to terminate your employment at any time and for any reason, and Anchor may exercise the same right, consistent with applicable laws.

Fair and Ethical Dealing: Each employee should endeavor to deal fairly and ethically with Anchor’s customers, suppliers, competitors and other employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair dealing practice. Fair dealing with other employees prohibits any employee from ignoring this Code, such as by making intentionally false statements or accusations to harm another employee.

Asking for Advice and Voicing Concerns: While working on behalf of Anchor, you may face difficult situations. Many times, your common sense, good judgment, our Code, and Company policies and procedures will be enough to guide you. However, there may be times in which you need additional help to make the right choice. In these cases, you have several resources available to you. These include:

- Your manager or supervisor
- Human Resource representative (Local or Corporate)
- Company’s Legal Counsel

If you become aware of a situation that may involve a violation of this Code, Company policy or any applicable law or regulation, you have a responsibility to report it. Violations or possible violations of this Code or of any law must be reported as follows:

- **Calling the toll-free EthicsPoint hotline at (877) 213-1020; or**
- **Filing a complaint over the internet at www.ethicspoint.com; choose file a report and then select Anchor Glass Container Corporation.**

You may also report issues by contacting Anchor’s Legal Counsel at Anchor Glass Container Corporation, 3001 N. Rocky Point Dr. E., Suite 300, Tampa, Florida 33607 or telephone: (813) 880-2136.

All reports will be treated confidentially and can be made anonymously. Employees are also expected to cooperate fully in any investigation of a violation or possible violation of this Code, Anchor’s policies, or law and to maintain the confidentiality of the matter.



INTRODUCTION TO OUR CODE OF BUSINESS CONDUCT

Anchor Will Not Tolerate Retaliation: It is important that you feel comfortable raising your questions and concerns. Anchor will not tolerate any form of retaliation against you for making a good faith report of actual or potential misconduct. If you feel an act of retaliation has occurred, you should report your concerns via one of the methods outlined in the “Asking for Advice and Voicing Concerns” section.

Implementation and Compliance: All reports received by Anchor will be promptly and thoroughly evaluated. Legal Counsel or the Audit Committee, which reports to the Board of Directors, or an authorized designee will take appropriate actions to investigate all reports, which may include, among other things, review of appropriate records and interviews with employees, utilizing a third-party auditor or doing nothing further if a report is deemed frivolous or cannot be substantiated.

Each of us is responsible for his or her own actions. Integrity is a personal responsibility. No employee can justify or escape the consequences of an illegal or unethical act or a violation of this Code by claiming it was ordered by someone in an oversight or authoritative role at any level of organization. No one, regardless of his/her position in Anchor, is ever authorized to direct an employee to commit an illegal or unethical act or to violate this Code.

Any employee violating this Code will be subject to disciplinary action, up to and including discharge, and could be subject to civil or criminal legal proceedings.



ONE ANCHOR – HOW WE TREAT EACH OTHER

Respecting Each Other and Promoting a Productive Workplace: Anchor respects and values the diversity reflected in our various backgrounds, experiences and ideas. Together, we provide an inclusive work environment that fosters respect for all of our colleagues, customers and business partners. Our workplace is one that reflects the diversity of the communities in which we operate and we are committed to provide employees a workplace that is free from unlawful discrimination, harassment or inappropriate personal behavior (including sexual advances, actions or comments of a sexual nature including explicit jokes, comments, e-mails, gestures or pictures) not conducive to a productive work climate. This applies to all phases of the employment relationship, including hiring, promotion, demotion, transfer, layoff or termination, compensation, use of facilities and selection for training or related programs.

If you know or suspect that unlawful discrimination, harassment or inappropriate personal behavior has occurred, you should report the situation immediately via one of the reporting channels described in the “Asking for Advice and Voicing Concerns” section.

Protecting Personal Data: At Anchor, we are committed to promoting a work environment and operating our businesses in a manner that fosters confidence and trust. To accomplish this goal, we must properly manage the personal data provided to us by our colleagues, customers, suppliers and others. “Personal data” includes any information that may identify an individual. Examples of personal data include name, physical address, email address, employee identification number, government identification number or any combination of information that might identify someone. We should only collect, access, use or disclose personal data for appropriate business purposes. In addition, we should use the minimum amount of personal data needed to accomplish a task. We must not share this information with anyone, either inside or outside our Company, who does not have a business need to know it and must take steps to properly secure such data at all times.

If you believe that personal data has been disclosed or used inappropriately, you should contact the Company’s Legal Counsel immediately. Failure to do so could subject our Company to fines and/or legal or regulatory action.

Substance Abuse: Substance abuse can limit our ability to do our work safely, which puts all of our well-being in jeopardy. For this reason, we may never work on behalf of Anchor while under the influence of alcohol, illegal drugs, misused prescription drugs or over-the-counter medications. This applies at all times while you are performing in your Anchor role or on behalf of Anchor even if the use occurs after hours or off Company premises. In addition, we may never use, possess, transfer or sell illegal drugs or alcohol, or misuse prescription drugs or over-the-counter medications, during working hours or while on Company premises.



ONE ANCHOR – HOW WE TREAT EACH OTHER

A Violence-Free Workplace: We work hard to prevent any acts or threats of violence in our workplace as part of our pledge to health and safety. Individuals who engage in violence or threats of violence may be subject to disciplinary action, up to and including termination of employment, as well as possible criminal prosecution. You should report all threats and acts of violence to your supervisor or Human Resources representative immediately. If you feel that someone is in immediate danger, you should also contact the local authorities.

Providing a Healthy, Environmentally Compliant and Safe Workplace: By implementing health, safety and environmental policies into all aspects of our business, we protect our people and the environment. Each employee has a responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices, and reporting accidents, injuries, and unsafe equipment, practices, or conditions. Compliance with quality processes and safety requirements is essential to minimize the risk of dangerous or unhealthy working conditions. All workplace accidents and injuries must be recorded and reported in accordance with the Occupational Safety and Health Act and other applicable laws.

We must make sure that our facilities are secure at all times. This means we allow only authorized individuals access to our worksites. If you believe that someone is attempting to improperly access an Anchor facility, contact local law enforcement and inform Executive Vice President – Operations.

Employees who engage in prohibited workplace activities may be removed from the work premises and are subject to disciplinary measures, up to and including termination (in accordance with any collective bargaining agreement, if applicable). Criminal behavior will be reported and prosecuted.

ONE ANCHOR – HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

We should conduct Anchor business free from outside influences or personal bias, and make business decisions based on the best interests of Anchor.

Avoiding Conflicts of Interest: As part of our duty to uphold our Company's reputation, we must avoid improper conflicts of interest. A "conflict of interest" occurs when our personal interests interfere with, or appear to interfere with, our ability to perform our jobs without bias. We may not engage in any interest, investment or association in which a conflict of interest might arise. If you have a potential or actual conflict of interest, you must disclose it by speaking with your supervisor or by contacting the Company's Legal Counsel. Conflicts of interest are often easily avoided if disclosed in advance. The following sections describe situations that may create conflicts of interest. It is important to remember that conflicts may also be created when a member of your household or immediate family is the individual involved.

Doing Business with Friends and Family Members: Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating or contracting process between yourself, a family member or a close friend and Anchor. This rule applies even in indirect situations where you, your family member or close friend owns or works on behalf of another company with which Anchor does, or is considering doing, business.

In addition, we need to avoid improper reporting relationships. Employees should never directly or indirectly supervise, or work under the supervision of a family member or someone with whom he or she has a close personal relationship. Any family members of senior leadership team (Vice President and above) will not be employed by Anchor.

Corporate Opportunities: In order to make objective business decisions on behalf of Anchor, we must never compete with our Company. This means we may not take for ourselves any business or investment opportunities that we discover through our position at Anchor or through Company property or information. In addition, we must never help anyone else take such business or investment opportunities for personal gain. This includes our family members and friends.

Outside Employment: From time to time, you may wish to engage in work outside our Company. In doing so, you must ensure that any outside employment does not create a conflict of interest. We must never use Anchor's tangible and intangible property, including documents, Information Technology assets, facilities, and intellectual property to conduct non-Anchor business.

Gifts and Business Entertainment: Developing strong working relationships with our customers, suppliers and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds. However, we must exercise caution when offering or accepting business courtesies. Exchanging gifts and entertainment can result in conflicts of interests. If not handled properly, they may also lead to the appearance of improper payments, kickbacks or corruption. You may not accept or provide any gift, favor or entertainment if it is made for an improper purpose, or if you know it would violate our policies, the law or the gift policy of the recipient's company. Certain customary business courtesies, such as covering the bill for a lunch or dinner in connection with a business meeting, normally would not violate this policy.



ONE ANCHOR – HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

Gifts and entertainment should only be offered or accepted if they:

- Do not create an obligation
- Are of reasonable and normal value (not to exceed \$100)
- Are not solicited

A *gift* is considered anything of value that is accepted from another individual or organization. *Entertainment* includes business courtesies such as meals, refreshments and cultural and sporting events. Acceptance of multiple gifts or entertainment courtesies within a short period of time from the same party is prohibited.

Gifts should not be accepted from suppliers or potential suppliers during the bidding process or contract negotiations. In addition, we should avoid soliciting gifts from suppliers or other business partners for Anchor functions or employee awards. Entertainment courtesies and gifts must be discussed in advance with your supervisor.

Improper Personal Benefits: A conflict of interest may also arise when an employee, or a member of his or her immediate family, receives improper personal benefits because of his or her position at Anchor. Such benefits may include gifts or loans from an entity or person with whom our Company does business. We must avoid accepting any such improper benefit. In addition, a conflict of interest arises if an Anchor employee assists a competitor to Anchor's detriment. For example, providing confidential information to a spouse or partner who works for a competitor would constitute a conflict of interest and violate our Code.

Financial Interests: As Anchor employees, we generally should avoid doing business with any company in which we have a personal financial interest. In addition, you may not purchase or maintain a significant financial interest in a customer, competitor or business partner that does business with or potentially does business with Anchor unless you receive written approval from the Company's Legal Counsel. Always ensure you are able to make business decisions with Anchor's best interests in mind.

Safeguarding Company Property and Information:

Anchor's Confidential Information: Anchor's confidential and proprietary information is vital to its success. We are each entrusted with our Company's confidential information. We must protect this sensitive information. Anchor's confidential and proprietary information includes pricing data, customer lists, financial information, business opportunities, designs, and manufacturing know-how and processes, procurement spend, investment strategy and other information useful to Anchor business not known to its competitors. We must never allow others to access Anchor's confidential information. We must take care not to lose, misplace or leave confidential information (or technologies containing such information including computer, laptops, cell phones, etc.) unattended. If we lose Company equipment or an item containing confidential Anchor information (for example, Anchor laptop, Smart phone or thumb drive), we should report the loss immediately to Information Technology Department.



ONE ANCHOR – HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

Anchor's Intellectual Property: We work diligently to protect our Company's intellectual property. "Intellectual property" includes any of our Company's patents, benchmarking data, trademarks, copyrights or other intangible assets, such as ideas, inventions, processes, or designs created on Company time, at Company expense, using Company resources or within the scope of our job duties. We will identify any new inventions we make and will direct them to the Company's Legal Counsel for patent, copyright or trade secret protection. You should report any suspected misuse of our Company's intellectual property to the Company's Legal Counsel.

Respecting the Intellectual Property Rights of Others: We respect the intellectual property rights of others. This means we must never knowingly infringe on the copyrights, trademarks or patents of others. We may not download unlicensed software onto Company computers or duplicate, publish or distribute copyrighted materials. We will not download songs, photographs and videos without consent from the rightful owner. In addition, we will not disclose or use the confidential information of former employers.

Use of Company Resources: The ability of Anchor to meet its commitments to stakeholders depends on the use of Anchor resources. These resources include technology, data, buildings, land, equipment, cash and the time and talent of employees.

As employees, we may not make improper use of Anchor resources nor permit others to do so. Improper use includes unauthorized appropriation, possession or use of Anchor assets. Anchor employees must ensure that any personal use is of Anchor equipment, such as phones or computers, is limited and does not interfere with the employee's ability to perform work for Anchor, and that it does not otherwise violate Company policy or the law.

Social Media and Networking Sites: Social media have changed the way many of us share information on a daily basis. While social media create new opportunities for communication and collaboration, such media also bring additional responsibilities that we must know and follow. "Social media" sites include a vast array of web sites and online resources. These include social networking sites (such as Facebook, Twitter, YouTube, Yahoo+ groups, Myspace and LinkedIn), blogs, photo and video sharing sites, forums and chat rooms, among many others. In your personal social media interactions, act responsibly and be careful to protect our reputation at all times. Never post confidential information about Anchor or our colleagues, customers, suppliers or business partners on any such sites. When you choose to go public with your opinions via a social media platform, you are legally responsible for your commentary. All Anchor policies and the Code apply to interactions between co-workers across the social web. If your communication would violate any of Anchor's policies in another forum, it will also violate them in an online forum.

The above is not intended to preclude or dissuade discussions among employees about wages, terms and conditions of employment or other topics protected by law. The above shall not be construed or applied in a manner that interferes with an employee's rights under Section 7 of the National Labor Relations Act.



ONE ANCHOR – HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

Compliance with Laws: It is Anchor's policy to comply fully with all laws and regulations that apply to its business. As you conduct Anchor business, you may encounter a variety of legal issues, particularly in the key areas described in this Section. If you have any questions on specific laws or regulations, contact Anchor's Legal Counsel.

Consumer Product Safety Laws: Anchor takes all reasonable steps to see that its products meet or exceed applicable federal, state and industry safety regulations and standards. Violation of these regulations and standards could result in injury to consumers and also expose Anchor to legal action. Any issues involving product safety standards should be reported to the Quality or Legal Department.

Antitrust and Competition Laws: We will follow the laws that govern competition with the purpose to prevent interference with a competitive market system. It is a violation of the antitrust laws for competitors to enter into an agreement or understanding, however informal, that unreasonably restrains trade. Price-fixing and allocation of products, markets, territories or customers are the clearest and most often prosecuted types of agreements among competitors that unreasonably restrains trade. In these cases, not only may Anchor suffer large damage awards and heavy fines, but also the individuals involved in the activity may be sent to jail. Company's Legal Counsel will organize training for antitrust laws with customer facing organization on a yearly basis.

Environmental Laws: Anchor is committed to making its products and operations meet or exceed all federal, state, local and local country environmental requirements. Any environmental issues should be reported to the Vice President of Engineering or to the Legal Department.



ONE ANCHOR – HOW WE TREAT OUR CUSTOMERS

Creating real value for our customers is important to our success as a Company. Our customers require that we provide safe, quality products and uphold the law in all our interactions with them.

Providing Quality Products and Services: We strive to provide products and services that meet or exceed our customers' requirements for quality, reliability and value. We are expected to comply with all quality control standards that govern our job duties. This includes applicable laws and regulations, as well as internal control procedures designed to promote the safe, quality manufacture of goods. We are also expected to follow all contract specifications and honor built-in client specifications at all times. We must also hold our suppliers and other business partners accountable to ensure the quality of the products and services they provide to us.

Seeking Business Openly and Honestly: Our actions in the marketplace define who we are as a Company. By competing on the quality of our goods and services, we uphold Anchor's reputation. We will never seek to limit the competitive opportunities of our rivals in deceitful or fraudulent ways. In addition, we never take advantage of anyone through unfair dealing practices. This means that we are careful not to misrepresent the quality, features or availability of our products or services. In addition, we do not disparage or make untrue statements about our competitors' products or services. We seek to win business based on the quality of our products and our people, not through any improper means.

No Commercial Bribery and No Improper Payments to Government Officials: We may not solicit, give or receive commercial bribes or unlawful kickbacks. We should also be careful to avoid even the appearance of such improper conduct. "Commercial bribery" generally includes any situation where an Anchor employee or someone acting on Anchor's behalf offers or gives something of value with the intent to improperly influence a business action or decision. Unlawful "kickbacks" generally include any situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Anchor. Anchor will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.

In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. "Improper payments" include both direct and indirect payments or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage. Note that improper payments can take the form of cash, gifts or lavish entertainment.

Following Accurate Billing Procedures: Our reputation in the marketplace is a critical company asset. For that reason, we reflect accurately on all invoices to customers the sale price or cost of goods or services sold and other terms of sale. We each have a responsibility to maintain accurate and complete records in order to allow Anchor to uphold this commitment. Never falsify any record – time card, expense report, sales numbers, test or quality records, or any other kind of record created during the course of your work for our Company – or make misleading or artificial entries on Anchor's books or records.



ONE ANCHOR – HOW WE TREAT OUR CUSTOMERS

Respecting Customer Property: At times, our customers may share their confidential information with us so that we may provide them with products and services. It is our responsibility to use, store and carefully safeguard any such information in a manner that complies with all applicable laws and non-disclosure agreements. We each must take the necessary steps to secure this information and ensure it is used only for approved business purposes.



ONE ANCHOR – HOW WE TREAT OUR SUPPLIERS

Anchor's suppliers are our partners for creating value creation for our stakeholders. The high caliber of the materials, value, reliability and services they provide is linked directly to Anchor's promise to its customers.

Seeking Long-Term Supplier Relationships: Together we strive to build long-term relationships with our suppliers. We use only legitimate, business-related criteria when choosing suppliers. Our Company will enter into supplier agreements only with companies believed to have demonstrated a record of and commitment to integrity. In addition, we never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

At Anchor, we allow suppliers to compete fairly on the quality of their products and services. We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. An occasional meal or entertainment in the normal course of business relations may be permissible, as long as:

- The representative of the supplier is in attendance
- Such hospitality is not excessive or unusual in nature
- The hospitality complies with applicable laws and is not otherwise prohibited by this Code

In addition, when practical, hospitality should be reciprocated.

Protecting Supplier Assets: We treat supplier confidential information with the same care as we treat Anchor's confidential information.



ONE ANCHOR – HOW WE TREAT OUR INVESTORS

At Anchor, we strive every day to build value for the investors and shareholders who have placed their trust in our Company and in each of us. To achieve this goal and create growth opportunities for our investors, we must do business with transparency and integrity.

Honest and Accurate Books and Records: Our investors rely on us to provide maintain accurate and complete books and records. These documents aim to give our investors an accurate view of our Company's operations and financial standing. In addition, Anchor uses these documents to analyze Company operations and make important business decisions. We have a duty and a legal obligation to make sure that the information we submit in all Company records is complete, accurate and understandable. This includes, but is not limited to, all of the information we provide in the following records:

- Accounting and financial records
- Payroll documents
- Timecards and time recording systems
- Travel and expense reports
- Product performance records
- Customer and supplier records
- Design and engineering records

Audits and Investigations: We all share a responsibility to cooperate with external and internal audits and investigations. This means we must provide auditors and investigators the information to which they are entitled, and maintain the confidentiality of the investigation. In addition, we may never attempt to interfere with or improperly influence their review. Refusal to cooperate with an internal Anchor or government investigation may result in disciplinary action. If you have any questions about what information an auditor or investigator is requesting and entitled to obtain, consult with the Company's Legal Counsel. If a governmental investigation occurs, management must contact Anchor's Legal Counsel as soon as possible before proceeding.

Records Management: It is our shared responsibility to retain Anchor's business records as long as needed for business purposes or longer, if required by tax, regulatory or other standards. If you know that documents in your control may be relevant to a lawsuit or government investigation, do not alter, conceal or destroy them. In some cases, the Legal Department may instruct you to preserve certain documents.

Inquiries from the Media: We strive to provide clear and accurate information to the media and the general public. This helps us maintain integrity in our relationships with our external stakeholders, which in turn strengthens our corporate reputation. Since accurate information is so crucial, only certain individuals may communicate with the media. If you receive a request for information from the media, forward it to Company's Legal Counsel.



ONE ANCHOR – HOW WE TREAT OUR COMMUNITIES AND OUR WORLD

In order to grow as a Company, we must work to have a positive impact on the communities that sustain us.

Protecting the Environment: We are committed to the health and safety of our employees and all stakeholders. We are also committed to protecting the environment.

Respecting Human Rights: Our Code, along with other Anchor policies, establishes practices and standards that address a broad range of human rights and workplace issues. Our Company does not condone or employ child labor. At Anchor, we will not employ anyone under the age of sixteen, even if authorized by local law. If local law is stricter than Company policy, we will comply with that law.

In addition, we will never use forced, indentured or involuntary labor in any of our operations. As part of our commitment to our communities and our world, Anchor will not tolerate any instances of human trafficking or other forced labor. We will also never conduct business with any third parties who engage in human trafficking or forced labor.

Making Political and Charitable Contributions: Our Company understands the many ways in which the political process enriches our communities. Freedom of belief and conscience are fundamental rights, and we are free to communicate our opinions verbally, in writing or in graphical form without threat of censorship. However, when we participate in such activities, we should do so on our own time, at our own expense and ensure that our activities do not conflict with the Code. We should not use Anchor's property for personal political activities. Employees who participate in partisan political activities should not in any way suggest or state that they speak or act on behalf of Anchor. We should never coerce a coworker, especially those with whom you have a reporting relationship, to support your particular causes.

Political contributions by corporations in connection with federal elections are unlawful in the United States. In addition, state and local political contributions are in many cases prohibited or are otherwise carefully regulated by law. Each employee is individually free to pursue political activities including contributions he or she deems appropriate; however, individual contributions must not be made with Anchor funds, or be reimbursed by Anchor. Where corporate political contributions to political candidates are allowed under state or local laws, such contributions shall be made only from funds allocated for such a purpose with the prior authorization of Anchor's Board of Directors.

Anchor is committed to social responsibility in every step of the Company's activities. Often times, our Company will support charitable activities in our local communities. Anchor may engage in such charitable activities, so long as both the charity and the activity have been approved by the management. You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Anchor's network. In addition, you may not use Anchor assets, including Company time, for personal charitable pursuits.

Anonymous Reporting of Violations
(877) 213-1020
See Page 6 For More Details



ANCHOR GLASS CONTAINER CORPORATE HEADQUARTERS

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