

# 2026 Global Customer Codes of Conduct



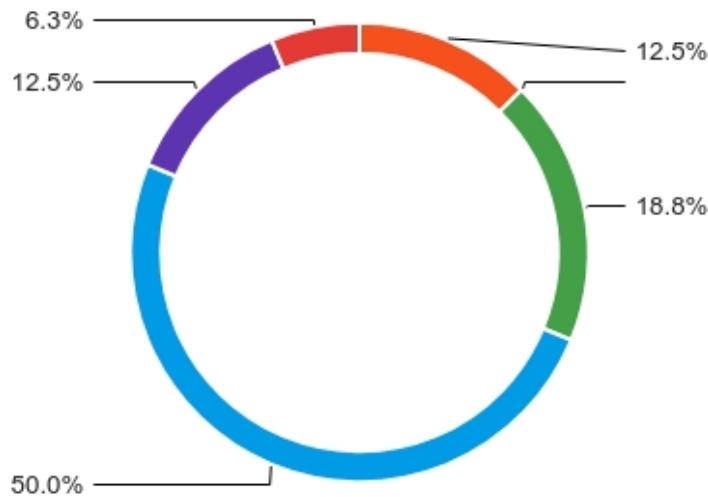
**Objective:** To benchmark how OEMs and suppliers are responding to the growing complexity of global customer Codes of Conduct (CoCs).

**Respondents = 16**

**Summary**

Based on a limited sample of 16 respondents, the findings should be viewed as directional and are not necessarily representative of the broader packaging and processing industry. Within this group, all respondents reported being asked by customers to comply with supplier Codes of conduct (CoCs), ESG requirements, or sustainability-related standards, with about 38% third indicating these requests occur frequently. Human rights and forced labor attestations were the most commonly cited requirement, followed by audit rights, environmental reporting, and supplier diversity requirements. While most indicated that current requirements are manageable to some degree, half described them as somewhat or very difficult to manage, and most reported addressing customer requirements on a case-by-case basis. Participation in third-party verification platforms remains relatively limited among respondents.

**Annual Revenue**

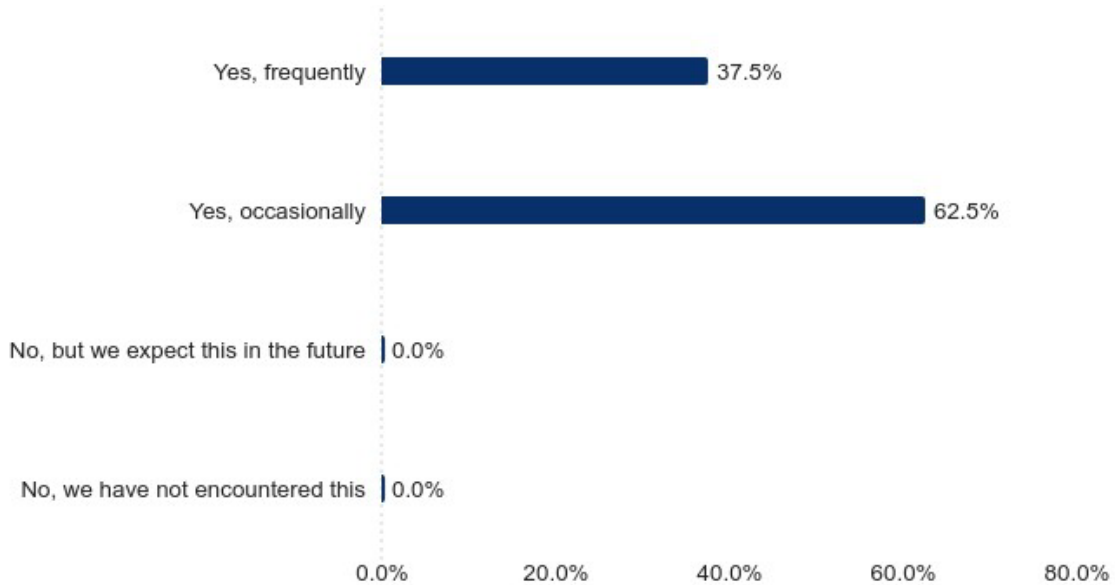


- \$250 Million +
- \$100 - \$249 Million
- \$50 - \$99 Million
- \$20 - \$49 Million
- \$10 - \$19 Million
- \$0 - \$9 Million

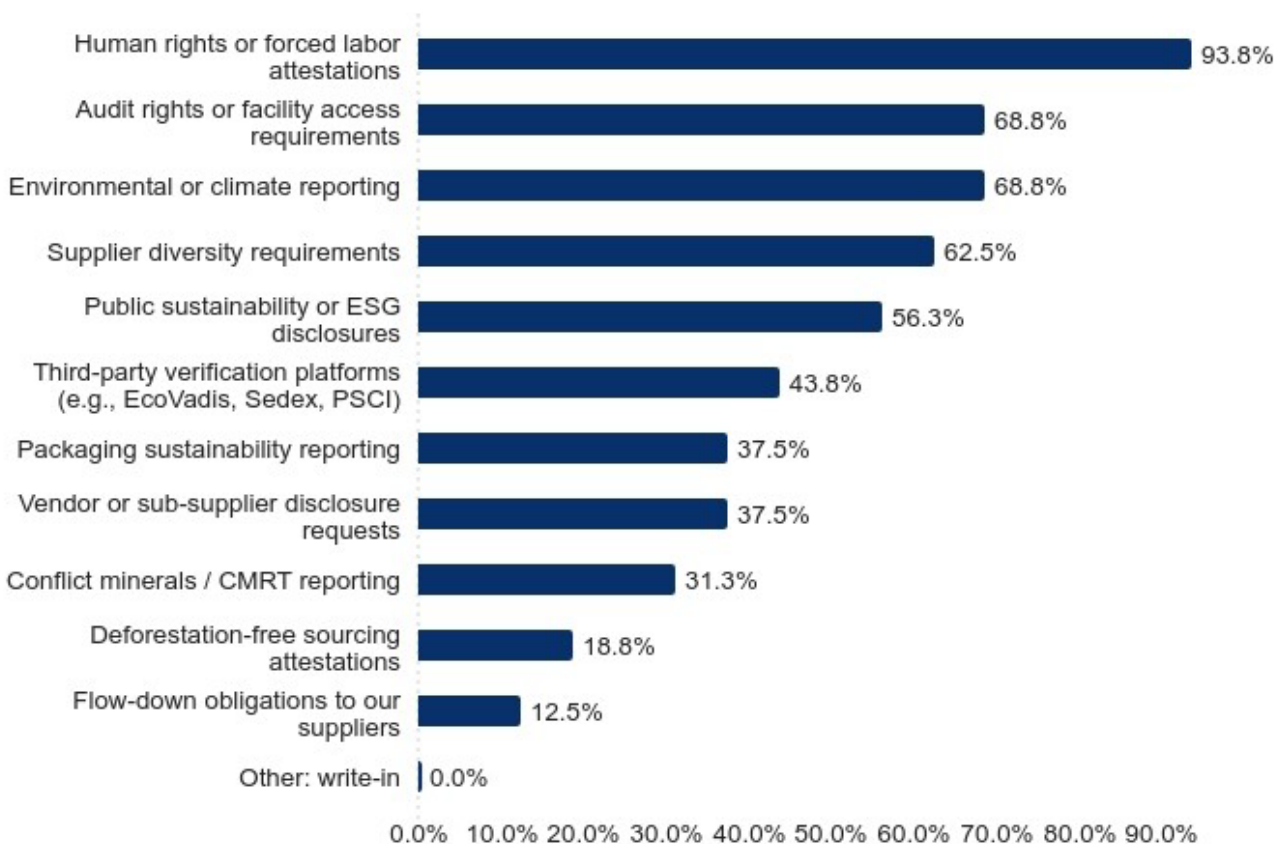
	Total	\$0 - \$9 Million	\$10 - \$19 Million	\$20 - \$49 Million	\$50 - \$99 Million	\$100 - \$249 Million	\$250 Million +
<b>Number of Respondents</b>	16	1	2	8	3	-	0

*Due to the limited sample size (n=16), findings should be considered directional and are reported at the total level only.*

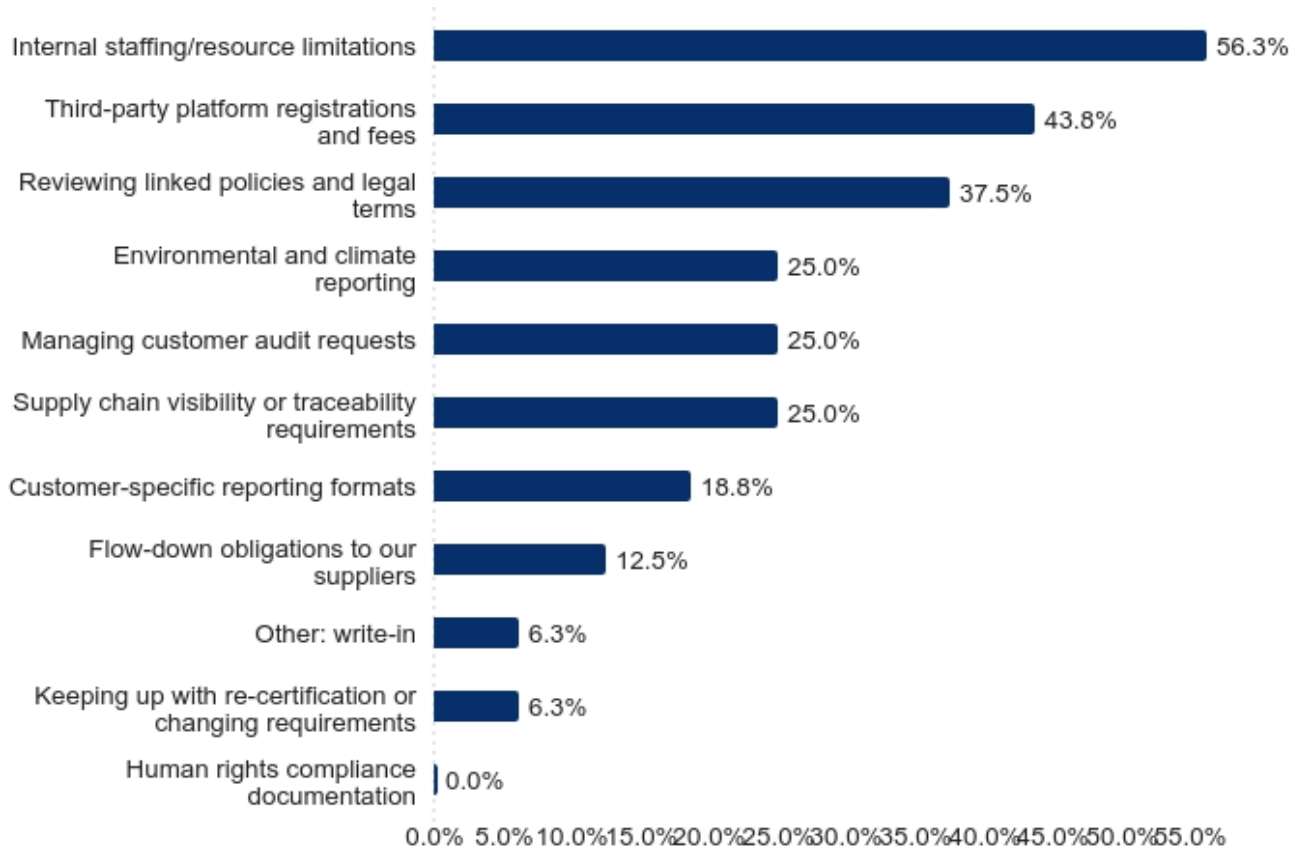
**1. Has your company been asked by customers to comply with supplier Codes of Conduct (CoCs), ESG requirements, or sustainability-related standards?**



**2. Which types of customer requirements has your company been asked to comply with? (Select all that apply)**



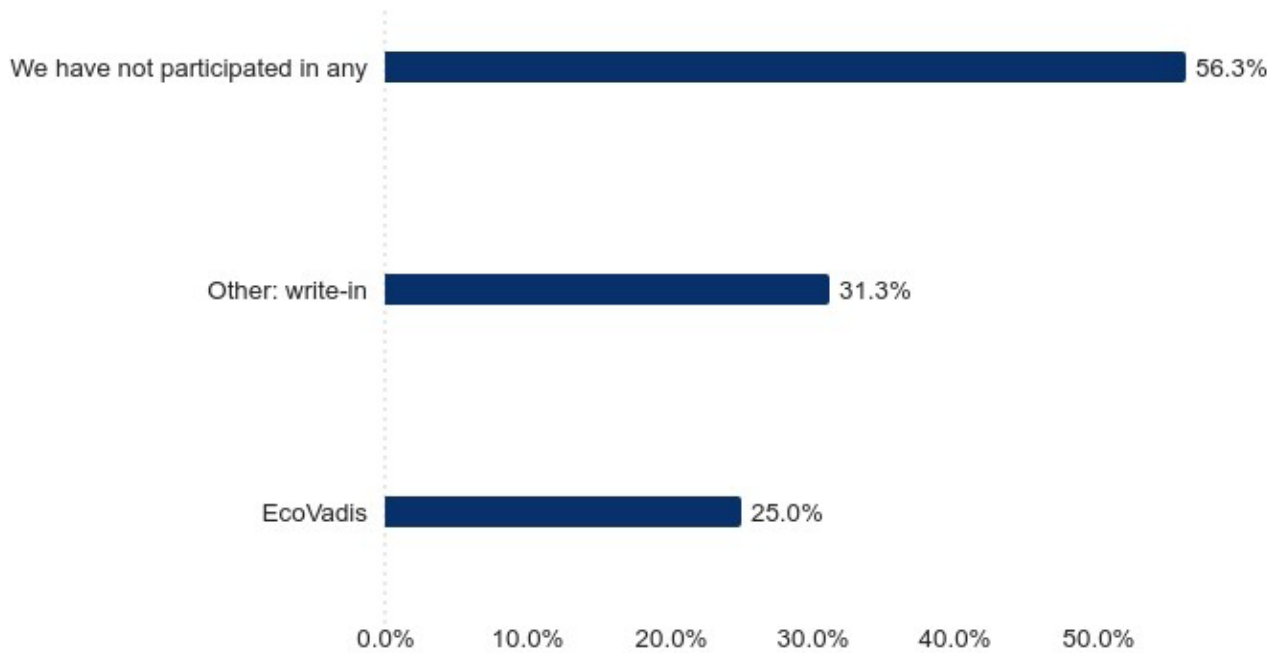
**3. Which aspects of customer Codes of Conduct create the greatest operational burden for your company? (Select up to 3)**



**Other: Write-in**

- Reporting requirements for multiple topics

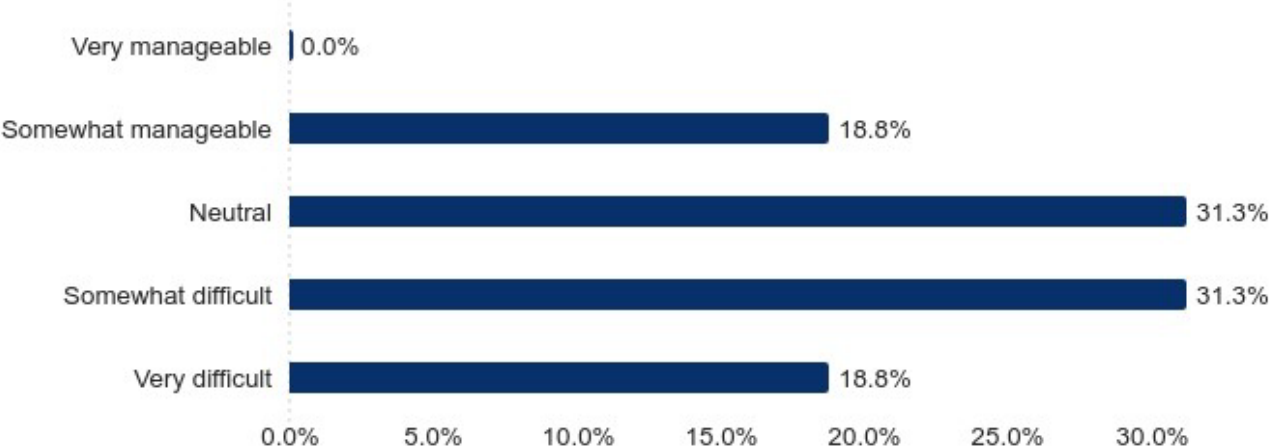
**4. Which third-party verification platforms or audit programs has your company participated in? (Select all that apply)**



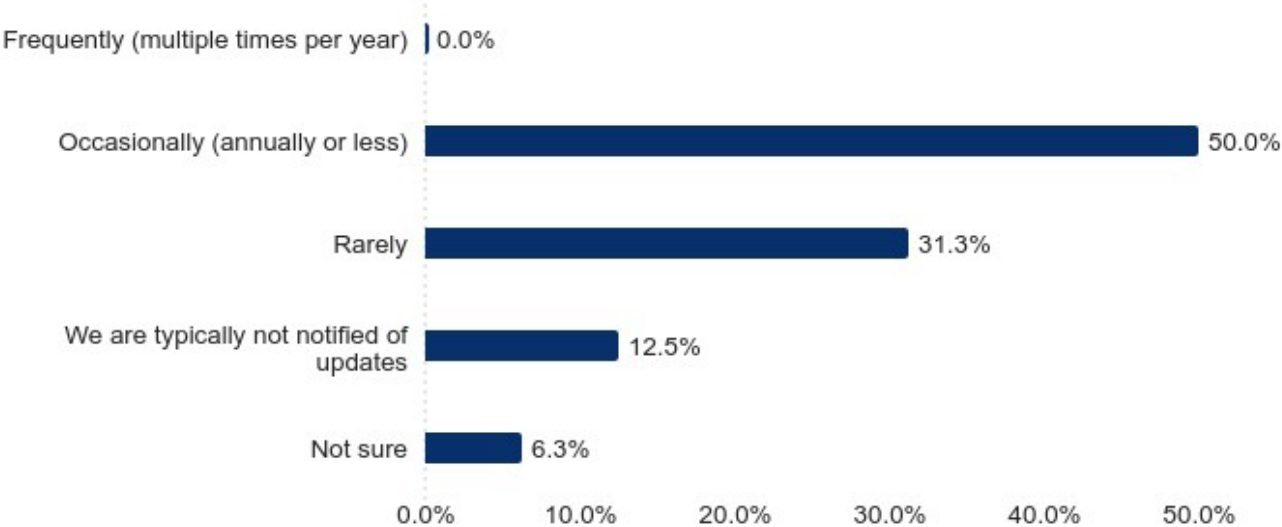
**Other: Write-in**

- ISN (2)
- Avetta (2)
- Contractor Compliance
- Have been requested to participate in EcoVadis but have not yet participated

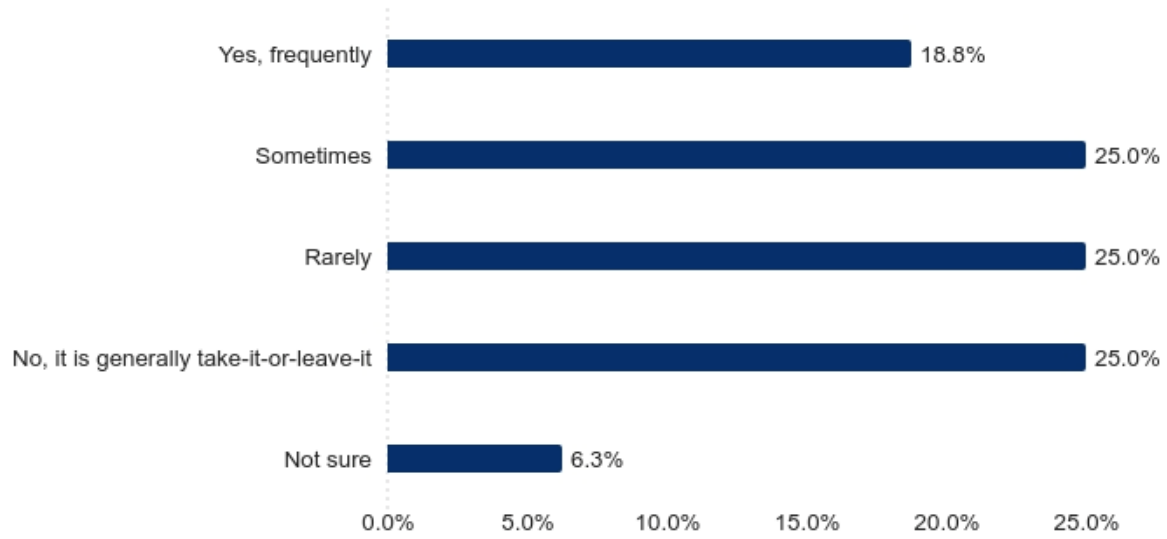
**5. How manageable are current customer sustainability and CoC requirements for your company?**



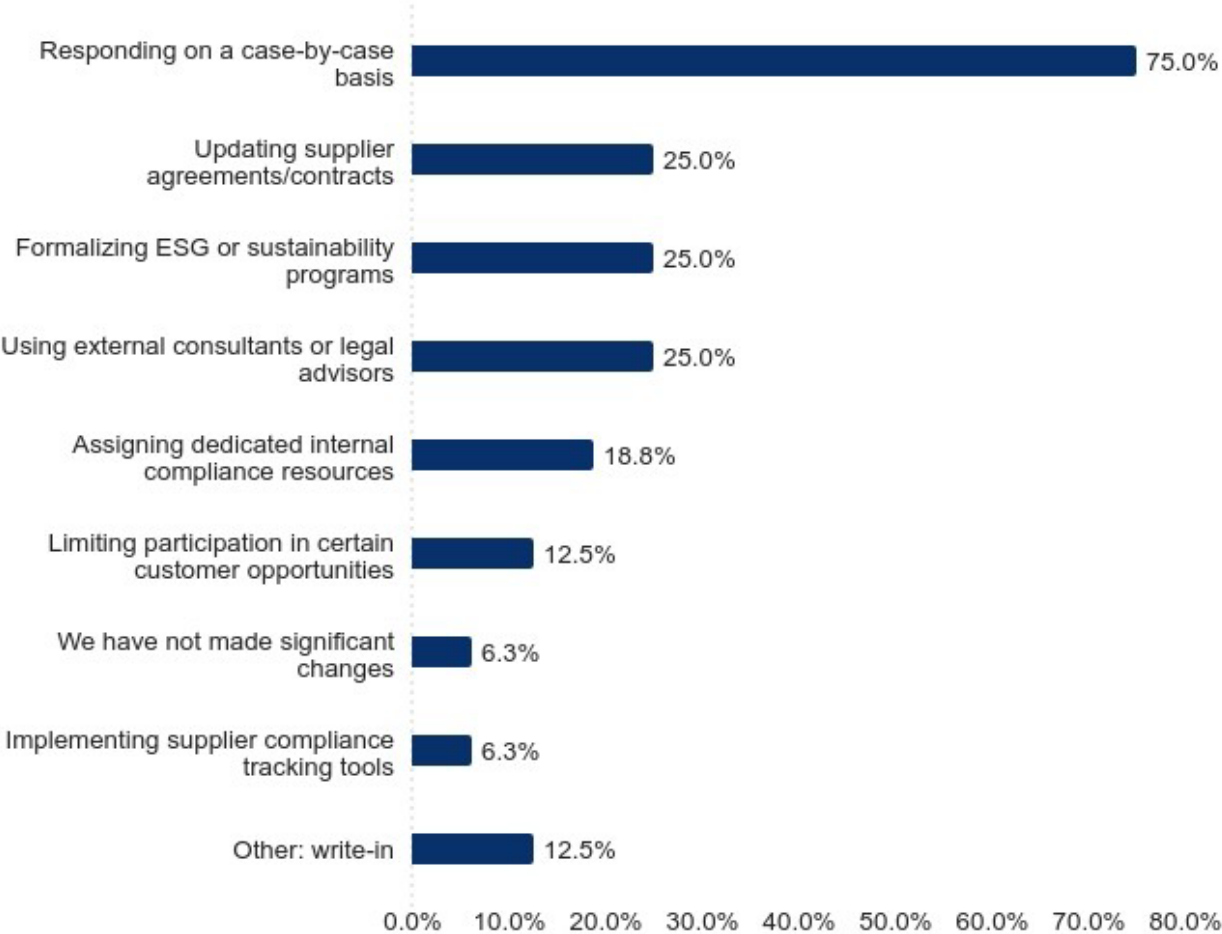
**6. How often are customer Codes of Conduct or related policy documents updated after initial agreement?**



**7. Does your company typically have the ability to negotiate or substitute equivalent policies when customers require acknowledgment of their Code of Conduct?**



8. How is your company currently responding to increased customer compliance requirements? (Select all that apply)



**Other: Write-in**

- For a company of our size and the work we do, the requirements put on us are nearly impossible to comply with.
- Fairly early in this journey, so not sure of impact at this time.

**9. What changes would most help improve the supplier/customer CoC process for companies like yours?**

- For a small company like ours, it is very difficult to respond to these requests. Majority of which require someone in our company to create a new policy and then put it into action, track it and supply the information customer's request requires. For example, for EcoVadis, we confirm in practice with most that is asked but we don't have a written policy and the tracking system that the EcoVadis platform requires.
- Although there appears to be some effort for industry group standards, our experience indicates participating companies can have significant differences in prioritization. Secondly, there do not seem to be provision to be excused from specific elements based on company size or consumption levels.
- The Customers are implementing a blanket requirement that doesn't allow for any commentary or relief or waiver.
- Standardization
- One of the biggest challenges today is the growing administrative burden associated with third-party compliance systems such as Avetta. While these platforms are intended to improve safety, quality, and risk management, suppliers often spend considerable time uploading documents, responding to questionnaires, and maintaining compliance records that are frequently duplicated across multiple customer systems.

**10. Any additional comments regarding customer CoC?**

- Our customers are primarily using Ecovadis and EcoVadis is nearly impossible to implement or comply.



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