

Quad Europe Supplier Code of Conduct

Purpose and Scope

Reputation and success Quad/Graphics Europe sp. z o.o. (hereinafter „Quad Europe“) starts with an unwavering commitment to honest and ethical business practices. Our long-standing value of Do the Right Thing reflects our culture of ethics and compliance, and forms the basis for this Supplier Code of Conduct (“Supplier Code”). Our expectation is that Suppliers will always Do the Right Thing and follow this Supplier Code at all times and in all situations. The Supplier Code sets forth our requirements in the areas of business integrity, labor practices, associate health and safety, and environmental management.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Quad Europe entities (collectively hereafter referred to as “Supplier” or “Suppliers”) are required to follow the Supplier Code. Failure to comply with the Supplier Code may result in the termination of Quad’s Europe relationship with a Supplier.

1. Maintain Knowledge of and Comply with Applicable Laws

Suppliers must maintain awareness and understanding of and comply with all applicable laws and regulations of the countries of their operation, including, but not limited to, all laws relating to anti-bribery and kickbacks, anti-corruption, insider trading, export compliance, economic sanctions and anti-boycott, money laundering and human trafficking.

2. Engage in Free and Fair Competition

A free and fair market ensures that our customers receive the best quality products at the best value. Suppliers must not engage in activities that illegally restrain free and fair competition, such as price fixing, bid rigging or market division

3. Conduct Business with Integrity, Free of Corruption

Suppliers must not sacrifice integrity to get business or business advantages – no matter the size or benefit to the Supplier or Quad Europe. Obtaining or attempting to obtain business or a business advantage or personal benefit through improper or illegal means is strictly prohibited. Suppliers must not give or receive bribes or kickbacks of any kind, obtain business through extortion or other corrupt methods or engage in transactions involving proceeds derived from unlawful activities.

If Supplier is aware of anyone soliciting or accepting a bribe, kickback or anything of value with respect to Quad's Europe business or other corrupt activity, Supplier must immediately notify Quad's Europe Legal Department.

4. Doing Business with Governments Carries Heightened Compliance Obligations

Suppliers are expected to be knowledgeable about applicable anti-corruption laws and take steps to ensure that personnel are adequately trained to ensure compliance. Suppliers must scrupulously abide by all anti-corruption laws act in accordance with the United States Foreign Corrupt Practices Act, U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act, all other foreign equivalents and other anti-corruption laws.

Suppliers must not, directly or through a third party, offer to provide, promise to provide, or authorize providing anything of value, directly or indirectly, to any government official to improperly secure a benefit for the Supplier or Quad Europe, including but not limited to, winning a contract, influencing the procurement process avoiding customs duties, expediting the import/export or permit process, gaining access to non-public bids, evading taxes or penalties, obtaining exceptions to regulations, influencing litigation, preventing contract termination. A "government official" includes: any officer or employee of a government or any department, agency, or instrumentality thereof. "Anything of value" includes, but is not limited to, cash or a cash equivalent (gift cards), gifts, travel expenses and/or payment of personal expenses, services, sports outings or other entertainment, charitable donations, medical treatment, loans, jobs for relatives, business courtesy, meal, entertainment or promise of a benefit. It does not matter if such activity is being carried out in a country where paying bribes is a common practice. Such activity is strictly prohibited – whether conducted directly or through a third party intermediary.

Suppliers must seek express written approval from Quad's Europe Compliance Department or Quad's Europe Legal Department before giving anything of value to a government official. All payments, both direct and indirect, made to government officials must be accurately recorded in the Supplier's books and records.

5. Protect Confidentiality

Suppliers with access to confidential information must not disclose such information to any other company or person without advanced written consent from Quad's Europe Purchasing Department. Confidential information includes, but is not limited to:

- Product specifications
- Product content
- Account information
- Quad's Europe brand (logo, name and tag line) in Supplier advertisements or references, this includes written, electronic, visual or verbal communication.

Supplier procedures must be in place to ensure that confidential information is protected against unauthorized disclosure and theft. Quad's Europe Legal Department or Purchasing

Department must be notified by Supplier, if they become aware of an actual or possible unauthorized disclosure of Quad Europe information.

6. Comply with All Export and Import Laws

Supplier must strictly adhere to import/export laws, trade controls, and trade compliance rules and regulations, regardless of where they are located, even if outside the United States. These include, but are not limited to, government-imposed export controls, trade sanctions and boycotts that place restrictions on the exports of certain items to particular destinations or parties or for specific end uses; anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not sanctioned by the United States; and laws mandating the proper classification of products for import or export.

7. Encourage a Diverse Workforce and Provide a Workplace Free from Discrimination, Harassment, Retaliation and Any Other Form of Abuse

Quad Europe expects its Suppliers to provide and foster a diverse and inclusive workplace. Suppliers shall conduct their workplace and business activities free from discrimination or harassment based on race, religion, creed, color, national origin, ancestry, sex, gender, pregnancy or related conditions, age, physical or mental disability, sexual orientation, gender identity, genetic information or any other basis protected by local law. Suppliers shall treat business partners and employees with respect and dignity, without regard to any protected category.

8. Treat Employees Fairly, Including with Respect to Wages, Working Hours and Benefits

Suppliers shall comply with all applicable legal and regulatory requirements relating to working hours, wages and benefits, including, but not limited to those pertaining to minimum wage, overtime, maximum working hours, rest and meal breaks, and time and recordkeeping.

9. Prohibit All Forms of Forced or Compulsory Labor

Quad Europe prohibits forced and compulsory labor and human trafficking and will not do business with any Supplier that engages in compulsory labor or human trafficking. Suppliers shall not use physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse or confiscate identify, immigration or work authorization documents as a method of discipline or control.

10. Prohibit the Use of Child Labor

Suppliers shall adhere to minimum employment age limits required by applicable law and regulation. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.

11. Respect Employees' Right to Freedom of Association and Collective Bargaining, Consistent with Local Laws

Consistent with applicable law, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.

12. Provide Safe and Healthy Working Conditions

Suppliers shall proactively manage health and safety risks to provide an environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, Suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

13. Carry Out Operations with Care for the Environment and Comply with All Applicable Environmental Laws and Regulations

Suppliers must comply with all applicable environmental laws and regulations and abide by three principles on the environment:

1. Support a precautionary approach to environmental change,
2. Undertake initiatives to promote greater environmental responsibility, and
3. Encourage the development and diffusion of environmentally friendly technologies.

To comply with these principles, Suppliers are to ensure that the resources and materials (including precious metals) they use are:

- Sustainable;
- Capable of being recycled;
- Used effectively with a minimum of waste unless Quad Europe specifically requests a Supplier to use a specific product or material; and
- Processes are planned, monitored and conducted in such a way to ensure environmental impacts are minimized.
- Suppliers must not use resources or materials that result in PFAS or any known carcinogen being brought onto any Quad Europe premises or incorporated into any Quad Europe materials.

14. Maintain Accurate Records and Bookkeeping

Suppliers must maintain and retain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices. Supplier payments, reports, records and filings made in the course of business must be accurate and truthful. No one may falsify or improperly alter any information contained in the Supplier's records. If signing a document, Supplier must ensure its accuracy. If Supplier knows of an inaccuracy in a Supplier or Quad Europe document, Supplier must report it immediately to Quad's Europe Legal Department.

For example:

- All funds, assets, transactions and payments must be accurately reflected;
- Payments for goods and services provided to Quad Europe must be payable to the company legally entitled to receive payment;

- All invoices must accurately reflect the items and services being purchased or sold and the prices being paid;
- Discounts must be included in the price or otherwise stated on our invoices;
- Documents and records must also be retained for the appropriate period of time as required by company policy or by the law;

15. Deliver Products and Services Meeting Applicable Quality and Safety Standards

Quad Europe is committed to producing high quality and safe products across all of our brands. Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at your location;
- Follow and adhere to good manufacturing practices and testing protocols;
- Report issues immediately to Quad Europe that could negatively affect the quality or public perception of a Quad Europe product; and
- Provide Safety Data Sheets (SDs) or technical documentation upon request, immediately,

16. Respect Animal Welfare

Suppliers must ensure that they do not conduct, or cause third parties to conduct, any animal testing on products, raw materials or components of finished products supplied to Quad Europe, unless such testing is necessary to meet the requirements of applicable laws or regulations.

17. Observe Quad's Europe Policies Regarding Gifts, Entertainment and Conflicts of Interest when Dealing with Quad Europe Employees

Suppliers doing business or seeking to do business with Quad Europe are prohibited from providing gifts, entertainment, favors, gratuities, and cash or cash equivalents to employees. Such gifts could influence an employee's ability to make appropriate judgments in the interests of the business. Modest business courtesies are acceptable only in connection with legitimate business purposes.

18. Adhere Quad's Europe On site Visit rules

Supplier inquiries should be directed to Quad's Europe Purchasing Department (e-mail: ZakupyW@quad.eu) Supplier site visits must be for valid business purposes and Suppliers must perform the following prior to visiting Quad Europe locations:

- Obtain approval from Department Manager/Supervisor (*where the visit is planned*) prior to visit,
- Have acknowledged understanding and receipt of Quad's Europe safety manual. „Arrangement on cooperation to ensure safety at work, the course of action in situation threatening life or health and environmental protection on the premises of Quad/Graphics Europe Sp. z o.o. in Wyszków”.

- Have completed Quad's Europe onsite safety orientation if needed it.

19. Support Compliance with the Supplier Code

Suppliers must establish appropriate management processes and cooperate with reasonable assessment processes requested by Quad Europe. To conduct business with Quad Europe, Suppliers must enter into contracts and execute purchase orders that mandate compliance with the Supplier Code. With prior notice, Quad Europe may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

Quad Europe expects Suppliers to act responsibly in all respects and to ensure that no abusive, exploitative or illegal conditions exist in their supply chains. Suppliers must also require that their subcontractors and vendors abide by the requirements and values as set out in the Supplier Code.

20. Report suspected violations of the Supplier Code

Suppliers may report suspected violations of the Supplier Code to the Quad ethics and compliance hotline at:

- U.S. and Canada 1-877-895-5411
- Argentina 0800-266-4534
- Brazil 0800-892-1579
- Chile 1230.0200.5584
- Colombia 01-800-912-0135
- India 000 800 0502 227
- Mexico 001-877-556-8022
- Perú 0800-70-005 and 0800-52-950
- Poland 0-0-800-111-1564

The locations below have specific access information for reports by phone.

First, dial the code below then enter the Ethics and Compliance Hotline number (877.895.5411) when prompted.

China:

- North, Beijing CNCG: 108.888
- PRC-South, Shanghai – China Telecom: 10.811

Denmark: 800.100.10

Dominican Republic: 1.800.225.5288

France:

- Telecom: 0.800.99.0111
- Telecom Development: 0805.701.288

Germany: 0.800.225.5288

Hong Kong:

- Hong Kong Telephone: 0.800.225.5288
- New World Telephone: 800.93.2266 Sweden: 020.799.111

Thailand: 1.800.0001.33

United Kingdom: 0.800.89.0011

Northern Ireland

- Ireland: 1.800.550.000
- UIFN: 00.800.222.55288

Vietnam

- Viettel: 1.228.0288
- VNPT: 1.201.0288

The ethics and compliance hotline is available worldwide on a 24/7 basis. Reports may also be made electronically by using web-based reporting:

- Europe: <https://qgeu.alertline.com>

All such reports are treated as confidential, whether provided through our telephone line or web-based reporting, and you may remain anonymous where permitted by law.

In plants in Poland, non-anonymous notifications or inquiries can be sent or to the e-mail addresses below:

- Legal Department: legal@quad.eu
- Purchasing Department:
ZakupyW@quad.eu

No Supplier may retaliate against an employee for making a good faith complaint or participating in an investigation under this Supplier Code.