



Being a responsible company

What it means to us

Code of Business Conduct and Ethics

There are seven things that will destroy us:

Wealth without work;

Pleasure without conscience;

Knowledge without character;

Religion without sacrifice;

Politics without principle;

Science without humanity;

Business without ethics.

-Mahatma Gandhi

CEO MESSAGE

Being a responsible company – *what it means to me*

At Printec, our Code of Business Conduct and Ethics is the foundation of our corporate ethos, reflecting our commitment to integrity, respect, and accountability in every aspect of our operations. This handbook is not merely a set of rules. It represents the principles that guide our behavior and decision-making, as well as the standards I expect us all to follow, regardless of our location or role.

Our code promotes a safe, inclusive workplace and fosters trust with our colleagues & partners. By adhering to these principles, we protect company assets, maintain high standards of compliance and contribute to a responsible future. As we continue to grow, it is considered as a cornerstone of our corporate culture, guiding us towards ethical excellence in every decision and action.

At Printec, we lead with responsibility, always considering the impact of our decisions on our employees, customers, and communities. From my point of view, our priority is to set the right example and build an environment, where every action aligns with our values. Trust, innovation, care, passion and teamwork lead us to do what's right, everyday.

It's not just about compliance. It's about making choices that contribute positively to both our company and society.

Our business conduct is very important to me and to the entire leadership team. It is essential for maintaining both our personal and collective reputation.

I encourage you to take the time to read this document and use it as reference in your day-to-day work. It should help you decide how to act if you ever find yourself in doubt. While we cannot describe every situation you might encounter, if you come across something that seems wrong or you need advice, please speak up. I am personally committed to fostering an environment where everyone feels comfortable raising their concerns without fear of retaliation.

A warm thank you to all of you who are consistently choosing what's right, no matter the challenge. Everyday. For everyone.

- Marina Mavrommati



Note



Before starting to read this Code of Business Conduct and Ethics, please reply honestly to the following question:

- **Do you believe that ethical behavior is an important and critical factor in today's and tomorrow's business environment?**
 - i. If the answer is **YES**, please continue reading.
 - ii. If the answer is **NO**, please just give the following some thought:
- **What life would be like if everyone behaves unethically and does what she/he wants, with no regard for consequences.**
- **Is that a world in which you would like to live?**



Contents

01

What is the Code of Business Conduct and Ethics?

- 1.1 The purpose of the Code
- 1.2 Who does the Code apply to?
- 1.3 Our responsibilities under this Code.
- 1.4 Who to contact if you have questions or concerns?
- 1.5 Anonymity and confidentiality
- 1.6 Violations of the Code
- 1.7 Investigations
- 1.8 No retaliation
- 1.9 Making false accusations
- 1.10 Compliance with various laws, rules, and regulations in different countries
- 1.11 Compliance with the GDPR

Application of the Code in the marketplace

- 3.1 Conflict of interest
- 3.2 Bribery, gifts, and entertainment
- 3.3 Using the company assets
- 3.4 Responsible travel and entertainment
- 3.5 Relatives and friends
- 3.6 Political activity
- 3.7 Communicating properly
- 3.8 Outside speeches, presentations, and social media
- 3.9 Protection of personal data
- 3.10 Information disclosure and dissemination; Confidentiality
- 3.11 Intellectual property

03

02

Application of the Code in the work environment

- 2.1 Respecting human rights & labor principles
- 2.2 Health and safety
- 2.3 What is workplace...bullying?
- 2.4 Drug and alcohol policy

04

A Final Word

What is the Code of Business Conduct and Ethics?

The Code of Business Conduct and Ethics (the “Code”) is a set of principles and rules of behaviors that will guide all Printec stakeholders to follow highest ethical standards in conducting everyday business activities. Following the Code will enable us to build an organization based on the Company’s mission, vision, values, and philosophy.

Printec (the “Company”) strives to apply high ethical and legal principles in every aspect of its business conduct. The Code is intended to be a guide to the Company’s ethical principles, and it outlines the key legal requirements that all Printec people must be aware of and comply with.

It is meant to complement existing standards, policies, and rules, not to substitute for them.



1.1

The purpose of the Code is:

- To be an important communication channel that will spread and uphold the Company's core values;
- To promote honest and ethical conduct and compliance with applicable laws, rules, and regulations in all internal and external relationships;
- To discuss ethical issues with all Company members and the way they deal with the ethical dilemmas, prejudices and challenges they face in their everyday work;
- The Code is an opportunity to build a positive brand identity, confidence and trust among employees, partners, customers, suppliers, and the communities in which the company's business activities are carried out.





1.2

Who does the Code apply to?

The Code is designed for:

- All Printec people: to recognize the responsibilities resting on each of us and to make sure we all adhere to the Company's values, for the benefit of each other. Its primary aim is to inform and guide our people in their roles.
- Management teams: to help them ensure that the decisions they make, the role models they represent, and the expectations they have of their colleagues take into account the Company's values.



1.2

Who does the Code apply to?

As a manager you have additional responsibilities to:

- Provide enough information and ensure that the employees you lead understand their responsibilities and liabilities under the Code.
- Establish a work environment where everybody feels secure and comfortable to discuss ethical issues and concerns.
- Never force your team or promote business-result achievement at the expense of ethical conduct or the law.
- Prevent the violation of the Code or the law. Managers should be all the time, in every situation, an appropriate role model of business conduct.
- Our clients, suppliers, and contacts, as they seek to understand the nature and values of the organization with which they are dealing.

1.3

Our responsibilities under the Code

We expect our people to acknowledge that they all have important responsibilities in their activities. Countless decisions are made every day. However, making decisions is not always easy. We understand that a formal Code cannot include every situation. In a fast-changing and complex business environment, it is impossible to predict the different circumstances that our people will face.

What are ethical relationships with our clients, partners, and suppliers?

Ethical relationships with our customers have a direct impact on the Company's success. Ethical business relationships require each and every one of us to conduct our activities as responsibly as possible for our business partners, customers, suppliers and by:

- Providing correct and honest information;
- Protecting our company's reputation and our customers' reputation;
- Respecting cultural diversity in all business activities and decisions;
- Respecting principles of competition and open-market economy;
- Delivering what we promise and not promising more than what we can deliver.

What is ethical in employee relationships?

Ethical employee relationships are essential for creating a positive work environment and also have a strong impact on the Company's success. This means that it is important to provide an environment where each employee feels he/she is treated equally and fairly.

The Company:



Respects every individual and values differences - in thought, style, culture, and experience.



Recognizes the value of each person, regardless of where they live, what they look like, what they think or what they believe.



Upholds the principles of dignity, equality, and mutual respect, which are shared across cultures, religions, and philosophies.

Diverse backgrounds and experiences make us stronger.



1.4

Who to contact if you have questions or concerns?



We all have an obligation to uphold the ethical standards of the Company. If you notice any behavior that concerns you and, in your opinion, constitutes a violation of this Code, report the case immediately. Doing so will enable the Company to deal with the issue and rectify it.

If you have any questions or concerns regarding the Code, you may consult with your Direct Manager, Group/Local HR Manager, or Group/Local Country Manager. There may, however, be situations that you will need to refer directly to the Group Ethics Committee.



The Group Ethics Committee

At Group level, the Group Ethics Committee is responsible for:

- Monitoring the compliance with this Code within the Group;
- Advising any employee on any issue regarding the Code's requirements;
- Investigating situations that could be a violation of the Code or the applicable laws, rules, or regulations.

The Group Ethics Committee consists of the:



Chief Executive Officer



Chief Compliance Officer



Chief People Officer



Group Customer Services Manager



Group Compliance Operations Consultant



Ask or Report

You can confidentially contact the Ethics Committee

Email: ethics@printecgroup.com

Online: SpeakUp & Ethics webform for all
<https://www.printecgroup.com/contact/>

Mail Address:
Printec, Ethics Committee
Mariahilfer strasse 32, 1070 Wien

The Ethics committee is available to answer any questions about the Code or Company compliance policies, or to discuss any concerns you may have about potential code violations.

1.5

Anonymity and confidentiality

What is the difference between anonymity and confidentiality?



Anonymity

Anonymity refers to the condition where an individual's identity is not disclosed or is protected, ensuring that their personal identity remains unknown. This means that the person's identity is kept hidden even from those who receive or use the information.

Confidentiality

Confidentiality involves protecting information from being disclosed to unauthorized individuals. While the information itself is protected, the identity of the person providing the information might be known to those who handle it. Confidentiality ensures that information is only shared with individuals who have a legitimate need to know.

Anonymity



Whistleblowing

An employee reports unethical practices or illegal activities within their company through [Speak Up](#), ensuring their identity is not known to their employer or colleagues.



Surveys and Polls

Surveys and Polls: Participants in surveys or polls are given the option to respond anonymously, ensuring their responses cannot be tracked back to them, thereby encouraging honest and candid feedback.

Confidentiality



Employee Records

An HR department maintains confidential employee records, such as performance evaluations and personal information, ensuring that this information is not shared outside the organization without proper authorization.

When you report suspected violations to the Group Ethics Committee, you may decide to remain anonymous. In order to facilitate communication to take appropriate steps and conduct proper investigation, the Company prefers for employees to identify themselves and encourages them to do so. We will acknowledge receipt of your report, and we will investigate any reported violations in due time.

1.6

Violations of the Code

The Company takes this Code and the obligations under it very seriously. Any person, regardless of his/her position in the Company, who chooses to violate the standards of this Code will be subject to disciplinary action, up to and including possible termination of employment. We also expect those with whom we do business to adhere to the standards set in this Code. You must promptly report any information about unethical conduct, such as:

- Crime - It includes all kinds of crimes, no matter if they are against a person or against property. If you know of or suspect a crime committed by a Printec employee, please inform immediately the Company no matter where and when it happened - inside or outside the workplace.
- Violation of various laws, rules, or regulations;
- Violation of human rights;
- Risk for employees' health & safety;
- Actions that can damage the Company's reputation;
- Discrimination and Harassment
- Bribery and Corruption
- Conflicts of Interest
- Fraud and Misrepresentation
- or Any behavior you believe violates this Code

The Local and/or Group Management are responsible for disciplinary action in any of the above cases.



1.7

Investigations



The Group Ethics Committee will confidentially investigate all reports of possible violation. After careful examination, the Committee will decide whether the Code or the law has been violated and will take or recommend an appropriate corrective action.

If you become involved in a Code investigation, collaborate and answer questions in good faith. You may remain anonymous when you call or mail the Ethics Committee, however the investigation may be hindered if the investigator is unable to contact you for further information.

1.8

No retaliation



Retaliation

Refers to any adverse action taken against an employee because of their participation in a legally protected activity, such as reporting unethical behavior, discrimination, harassment, or other violations of company policies, this Code or the law. Retaliation can include, but is not limited to, demotion, dismissal, salary reduction, job or shift reassignment, or any form of discrimination or harassment.

Examples



Demotion: Lowering an employee's rank or position in the organization as a punishment for reporting misconduct.

Dismissal: Firing an employee for filing a complaint or participating in an investigation.

Salary Reduction: Decreasing an employee's wage as a form of punishment.

Job Reassignment: Moving an employee to a less desirable position or shift as a result of their whistleblowing activity.

Harassment: Creating a hostile work environment for the employee who reported an issue, which can include verbal abuse, exclusion from projects or meetings, or other forms of mistreatment.

Protection Against Retaliation



The Company appreciates the help of employees who identify potential problems. We want you to know that we will not discharge, demote, or suspend you if you provide information or assist in an investigation regarding conduct that you reasonably believe is unethical or that constitutes a violation of law, this Code, or our other policies.

Any retaliation against an employee who raises an issue honestly is a violation of this Code. If you work with someone who is under an investigation, you should continue to treat the person with courtesy and respect. Remember that everybody is considered innocent unless the investigation reveals a violation.

Employees are encouraged to report any instances of retaliation to the Group Ethics Committee or through our **“Speak Up”** reporting channel within the organization. Employers are responsible for investigating claims of retaliation promptly and taking appropriate corrective action if necessary.

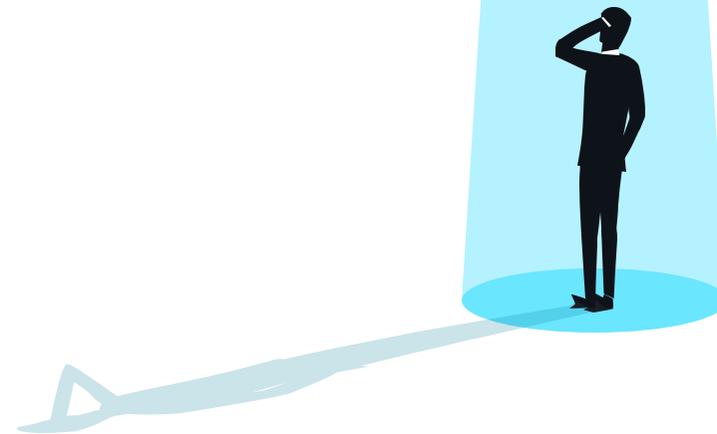
1.9

Making false accusations

One of the most damaging things we can do to someone else is making false accusations. These actions can destroy lives, especially if the accused is innocent.

This Code generally prohibits knowingly and willfully making false or fraudulent statements. The Company will protect any employee who reports his/her concerns honestly; however, it is a violation of the Code to deliberately make a false accusation.

Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.





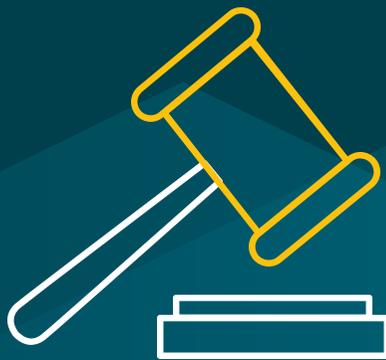
1.10

Compliance with various laws, rules, and regulations in different countries

As a global company, we are subject to numerous laws, rules, and regulations. All companies in the group of Printec must respect and adhere to the laws, rules and regulations of the countries and cities in which they operate.

You must comply with all applicable laws, including those related to insider trading, financial reporting, money laundering, fraud, bribery, and corruption.

While we do not expect you to be a legal expert, all our employees are expected to understand and comply with the local legislation applicable to their jobs and seek advice from their Country Managers and/or the Group Leaders , or the legal department.



1.11

Compliance with the GDPR

Printec is committed to complying with all relevant EU and Member State laws in respect of personal data, and the protection of the rights and freedom of individuals whose information Printec collects and processes in accordance with the General Data Protection Regulation (GDPR).

Printec is a data controller and data processor under the GDPR.

GDPR





Application of the Code in the work environment

02

2.1

Respecting human rights and labor principles

Adopting fair and ethical labor practices and promoting human rights is essential to our reputation and on-going success. In December 2014, Printec became a participant in the UN Global Compact and supports its Ten Principles. Accordingly, we are taking specific actions in order to ensure the following:

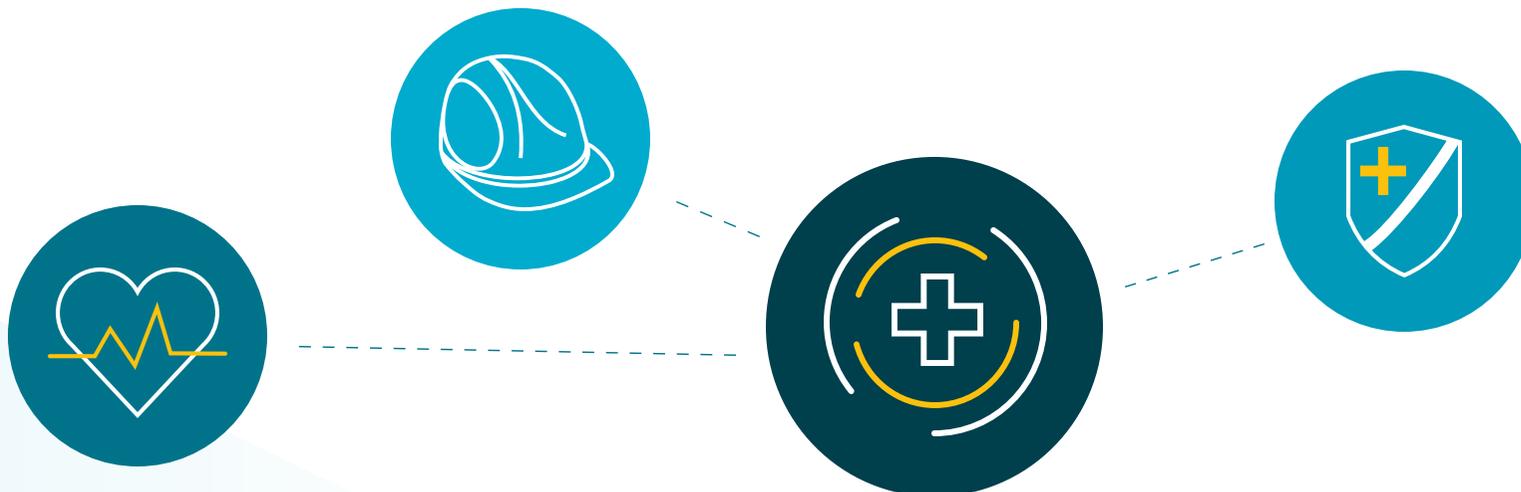
- Healthy and safe working conditions – providing a healthy and safe working environment in accordance with applicable laws and regulations;
- Wages and working hours – complying with local legislation on minimum wages, working hours and employee benefits;
- Freedom of association – allowing our employees to associate with lawful and peaceful workers' associations;
- No discrimination – not subjecting people to discrimination based on factors including ethnicity, age, religion, and sexual orientation, amongst others;
- No child labor – not employing people under the age of 15 or younger than the age for completing compulsory education;
- No forced employment – not using forced labor and not using employment where terms are not voluntary;
- No disciplinary treatment – not subjecting people to harassment, violence, or intimidation;
- Responsible environmental management – fully complying with local legislation and industry regulations.

2.2

Health and safety (H&S)

Health and safety policy protects the health, safety, and welfare of employees in the workplace and has a strong focus on primary prevention of hazards. All companies that are part of the Printec Group must establish adequate safety-and health at-work policies and a culture of labor risks prevention. Each Printec company must ensure compliance with the local regulations in the country and the adoption of the required appropriate preventative measures for each case.

All Printec employees must know and comply with the health and safety policies of the Company at group and country level. They must take care of their own safety, as well as of the safety of other employees, customers, suppliers, and collaborators.



Employees must

- Know about workplace hazards and what to do about them from their first day with the Company;
- Wear and use the protective equipment required by their Employer;
- Work and act in a way that will not lead to hurting themselves or anyone else;
- Report any hazard or injury to their Supervisor;
- Participate actively in solving workplace health and safety problems;
- Refuse work they believe is unsafe.

Managers must

- Make sure employees know about hazards and dangers by providing information, instruction, and supervision on how to work safely;
- Make sure everyone obeys the law and follows the health-and-safety-at-work policies and procedures;
- Monitor that the health-and-safety-at-work policies and procedures of the Company are implemented correctly and inclusively;
- Make sure employees wear and use the right protective equipment;
- Do everything reasonable as per circumstances to protect employees from being hurt or getting a work-related illness.



2.3.1

What is discrimination, harassment, workplace bullying?

Printec embraces diversity in all its forms, respects individuality and condemns discrimination of any kind.



Discrimination

Discrimination occurs when a person, or a group of people, is treated in a negative way or less favorably than another person or group, based on immutable characteristics, because of their age, race, national or ethnic origin, sex, sexual orientation, pregnancy, marital status, disability, religion, sexual preference, or some other characteristic.



Racial

Hiring practices: A qualified candidate is not hired because of their race, despite having the necessary skills and experience for the job.

Promotion denial: An employee is passed over for a promotion in favor of a less qualified candidate due to racial biases.



Gender

Pay Inequality: A female employee is paid less than a male colleague who performs the same job with the same qualifications and experience.

Job assignment: Women are routinely assigned to administrative tasks while men are given more challenging and high-profit projects.



Age

Termination: An older employee is laid off or fired, while younger employees with similar or less experience are retained.

Hiring bias: An employer decides not to interview or hire a candidate because they are perceived to be too old for the position.



Disability

Unreasonable Accommodation:

An employer fails to provide reasonable accommodation for an employee with a disability, such as modifying workstations or providing assistive technologies.

Exclusion from Opportunities: A qualified employee with a disability is excluded from training programs or promotional opportunities because of their disability.



Genetic Information

Medical Inquiries: An employer asks an employee or job applicant for genetic information or family medical history during the hiring process

Employment Decisions: An employee is treated unfavorably or terminated based on their genetic predisposition to certain medical conditions.

Different types of discrimination are prohibited by law in many countries.

2.3.2

What is discrimination, harassment, workplace bullying?



Harassment

Harassment is any form of unwanted and unwelcome behavior which may range from unpleasant verbal remarks to physical contact or violence. Harassment covers a wide range of conduct - from direct requests of sexual nature to insults, offensive jokes, which results in a hostile work environment. It comprises unacceptable behavior, actions or comments that humiliate, or cause embarrassment, and any act such as intimidation or threat.



Examples

Examples include, but are not limited to:

- telling insulting jokes about particular group of people, just because they are different, slurs, disparaging remarks, off-color jokes, insults, vulgar language, and teasing;
- displaying offensive posters, screen savers, symbols, drawings, computer images or e-mails;
- making derogatory comments or ridicule about someone's religion;
- asking intrusive questions about someone's personal life.

Examples of sexual harassment may include:

- Unwelcome propositions, demands or advances of a sexual nature
- Unwelcome physical contact such as hugging, kissing, grabbing, pinching, patting, or brushing up against someone
- Unwelcome and inappropriate remarks about someone's body or appearance, sexual gestures or comments or unwanted verbal or physical interactions of a sexual nature
- Unwelcome vulgar or obscene gestures, language, or comments



Some of the signs that your co-workers might be feeling harassed include:

- your colleague takes more sick days;
- increased employee turnover; new employees leave company soon after starting;
- people in the Company seem reserved and isolated;
- breakdown of relationships between staff and management;
- people showing less loyalty and commitment.

2.3.3

What is discrimination, harassment, workplace bullying?



Workplace bullying

Workplace bullying is defined as the repeated unethical and unfavorable treatment of one person by another in the workplace, which may be considered unreasonable and inappropriate workplace practice. Bullies usually utilize power attributed to their status, skills, or position in the workplace, and both men and women can be the targets and/or the perpetrators. Workplace bullying can occur between an employee and a manager or supervisor, or between co-workers. Bullying behavior can range from very obvious verbal or physical assault to very subtle psychological abuse.



This behavior may include:

- physical or verbal abuse
- offensive or aggressive language or yelling
- intimidation
- excluding or isolating employees
- giving employees impossible jobs
- assigning meaningless tasks unrelated to the job
- undermining work performance by consciously withholding information vital for effective work performance
- pressuring someone to do something against their will



Verbal Bullying

Intimidating Language: A supervisor consistently uses threatening or demeaning language toward an employee, such as calling them names or making belittling comments about their work.

Public Humiliation: An employee is regularly criticized or ridiculed in front of their colleagues, leading to embarrassment and reduced self-esteem

Excessive and Unjustified Criticism: A manager provides constant, unwarranted negative feedback and complaints about an employee's performance, even when their work meets or exceeds expectations.



Physical Bullying

Unwanted Physical Contact: An employee is frequently touched inappropriately, such as unwanted pats on the back or rough handling of personal belongings.

Aggressive Gestures: An employee engages in aggressive physical gestures, such as slamming doors or throwing objects, to intimidate or threaten colleagues.

Blocking Access: An employee deliberately blocks another employee's path or workspace, making them feel unsafe or restricted.



Relational Bullying

Exclusion: An employee is intentionally excluded from team meetings, social events, or important communications, isolating them from their colleagues and essential work activities.

Gossip and Rumors: Spreading false or malicious rumors about a coworker to damage their reputation or create conflicts within the team.

Undermining Work: Deliberately sabotaging or undermining a colleague's work, such as withholding information or failing to provide necessary support.



Cyberbullying

Harassing Emails: Sending aggressive, insulting, or threatening emails to a colleague, often anonymously or under the guise of a fake email account.

Social Media Attacks: Posting derogatory comments or personal attacks about a coworker on social media platform, creating a hostile online environment.

Excessive Monitoring: Constantly tracking or criticizing an employee's online activities or communications, leading to increased stress and pressure.



Manipulative bullying

Favoritism: A manager or supervisor plays favorites, providing preferential treatment or special privileges to certain employees while neglecting or punishing others.

Undue Pressure: Placing unreasonable demands on an employee, such as requiring them to work excessive hours or meet unattainable deadlines, to make them fail.

Unfair Workloads: Deliberately assigning excessive or undesirable tasks.



Economic bullying

Withholding Resources: Denying an employee access to necessary resources or information needed to perform their job effectively

Unjust Denial of Benefits: Unfairly denying an employee benefits, such as promotions, raises, or professional development opportunities, as a form of punishment or control.



Micro-management

Excessive Oversight: Constantly scrutinizing and controlling every aspect of an employee's work, undermining their autonomy and confidence

Undermining Autonomy: Frequently changing work assignments or processes without consultation, creating confusion and reducing the employee's ability to perform effectively.



No employee or non-employee may harass another employee, candidate, client, vendor, supplier, visitor, or any other person. We will not tolerate violence, threatening and malicious behavior, intimidation, or any form of workplace violence from any source.

The Company strives to create a work environment free of discrimination, harassment or bullying in compliance with the Company values.



2.4

Drug and alcohol policy



Employees are not permitted to use, possess, sell, transfer, manufacture, distribute or be under the influence of drugs on Printec owned or leased property, during working hours, while on company business trip or while using company property.

In addition, no employee may report for work, go on or remain on duty while under the influence of, or impaired by, alcohol or drugs or illegal substances. Alcohol use at company-sponsored events by any employee should be done responsibly.

Any violation will result in disciplinary action up to and including termination of employment.



Application of the Code in the Marketplace

03

3.1

Conflict of interest



It is usually a conflict between the private interests and the official responsibilities of a person in a position of trust. A conflict of interest is a situation in which someone's private interests are opposed to her/his responsibilities and therefore cannot make a fair decision because they will be affected personally by the result.

A conflict of interest arises in the workplace when an employee has competing interests or loyalties that are or potentially can be at odds with each other. Printec employees are expected to diligently avoid such conflicts.



Employment Conflicts

Dual Employment: An employee works for a company while also working for a competitor, potentially dividing their loyalty, and sharing sensitive information.

Influence on Hiring: A hiring manager hires a family member or friend for a position, potentially leading to biased decisions and favoritism.



Financial Conflicts

Personal Investments: An executive with a substantial stock holding in a competitor's company makes decisions that could benefit their personal investments rather than the company they work for.

Bribery or Kickbacks: A procurement officer accepts gifts or payments from suppliers in exchange for preferential treatment or awarding contracts.



Procurement and Contracting

Vendor Relationships: An employee responsible for selecting vendors has a personal relationship with one of the vendors, leading to biased selection and potential favoritism.

Contract Negotiations: A project manager who owns a side business that provides services similar to those needed for a company project may steer business towards their own company.



Decision-Making Conflicts

Board Member Interests: A board member has a financial interest in a company that is competing for a contract with the organization they are supposed to govern, influencing their decision-making.

Research bias: A researcher with financial ties to a product manufacturer may design studies or interpret results in a way that benefits their sponsor, rather than providing impartial findings.

3.2

Corruption, Bribery, Gifts and Entertainment



Corruption

The misuse of entrusted power or position by government officials, corporate managers, or other individuals for private gain. This unethical behavior often involves bribery, fraud, embezzlement, or other forms of dishonesty to achieve personal benefits or to influence business or government decisions. Corruption undermines trust, distorts markets, erodes the rule of law, and can lead to significant social and economic consequences.



Types of corruption:

- i. Active & Passive bribery – Offering, giving, receiving, or soliciting something of value to influence a decision or action
- ii. Collusion - Where two employees, either from the same or different organizations, make unlawful arrangements for their mutual, personal gain
- iii. Coercive Extortion - Making explicit or implicit threats from a position of power in order to coerce the opposing party to pay up or risk unfair treatment
- iv. Insider Trading - Receiving a bribe in exchange for divulging private and confidential information
- v. Embezzlement - Stealing or misappropriating money and other valuables entrusted by the company or organization.
- vi. Fraud – Deceptive practices intended to secure unfair or unlawful gain

3.2

Corruption, Bribery, Gifts and Entertainment



Bribery

A bribe is giving or offering to give anything that might have value to somebody on decision making position, including cash, gifts, meals, entertainment, business opportunities or a company product in order to influence a decision. There is no monetary acceptable limit; any amount could be construed as a bribe.

A “**Bribe**” is defined as:

a) **Active bribe:**

Offering, promising or giving anything of value to improperly influence another in order to obtain or retain business for the Company or to gain an advantage for an individual;

b) **Passive bribe:**

Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the obtaining or retaining of business by the Company.



Active bribe

- i. Bribing a public official so your company is awarded lucrative government project contracts; many countries have legislation that criminalizes bribery of government officials. The sanctions for violating these laws can be severe, including significant individual and corporate fines, and even imprisonment.
- ii. Offering an expensive trip to a potential supplier's account manager, in order to achieve a greater discount on an existing offer for the organization you represent
- iii. Granting gifts of excessive value to individuals inside or outside the organization, in exchange for receiving insider or competitor information that can affect forthcoming business decisions
- iv. Hiring a relative or a friend "under the table", in exchange for future personal benefits



Passive bribe

- i. A security guard receiving a bribe from criminals in exchange for allowing access to facilities and assets with the intention of theft
- ii. An executive accepting a bribe to promote a person who would not have been selected otherwise.
- iii. A bank employee accepting a bribe in exchange for confidential bank details.



Bribes may include granting (or receiving):

- i. Gift cards
- ii. Materials or equipment of high value
- iii. Cash
- iv. Loans on privileged terms
- v. Airline tickets, vacation, or entertainment provisions
- vi. Expensive meals
- vii. Unlawful contributions to political groups or charities
- viii. Employment opportunities for close relatives, friends, or family members for the sake of personal benefits
- ix. Any other type of illicit activity, that can provoke intended unfair influence in key decisions of any kind

3.2

Corruption, Bribery, Gifts and Entertainment



Gifts and Entertainment

A conflict of interest may also occur when you provide or receive gifts or entertainment.

- Do not accept gifts, meals or entertainment, or any other favor, from customers or suppliers, if doing so, might compromise your ability to make objective business decisions in the best interest of the Company.
- Do not accept gifts in exchange for doing, or promising to do, anything for a customer or supplier.



As a business politeness, we may receive and provide occasional gifts, such as:

- Nominal gifts, advertising novelties which are usual and customary for professions (pens, calendars etc.)
- Gifts or discounts offered to a large group of employees as part of an agreement between the Company and a customer or supplier may be accepted and used as intended by the customer or supplier.
- Invitations to business-related meetings or conferences (product training seminars, a business luncheon or dinner).
- Gifts of symbolic value that are inscribed in recognition of a business relationship may be accepted.
- Invitations to social, sporting, or other events, if the cost is reasonable and attendance serves a customary business purpose.

What is the difference between a gift and a bribe?

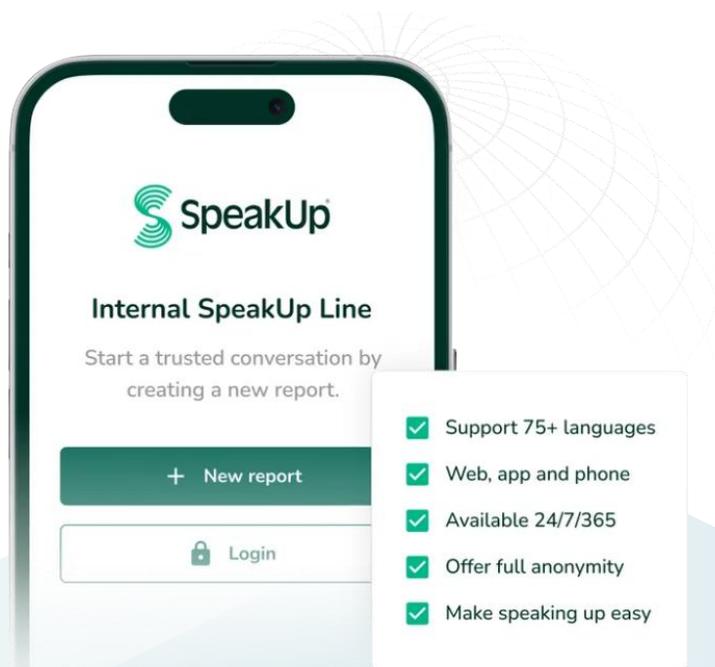
A gift is something of value, given without the expectation of return; a bribe is the same thing given in the hope of influence or benefit. Gifts and bribes can be monetary, actual items or they can be tickets to an event, travel, entertainment, presents, restaurant meals etc.

Even if we agree that giving a bribe or forcing someone into influencing a decision or outcome is wrong, it is sometimes difficult to decide where to draw the line between permissible and impermissible actions. Sometimes accepting these gifts may be a proper part of a business relationship. In some situations, however, accepting them may be a serious infringement of business and professional ethics, and perhaps even a violation of the law. Even the suggestion of corruption may damage the reputation of the Company and affect its ability to do business.

SPEAK UP: Report Compliance Concerns

Printec is committed to maintaining a high standard of business ethics and safety within the organization and its affiliates. It promotes a strong culture of transparency and integrity and is committed to detecting and addressing misconduct and ensuring that those who become aware of it can report it in good faith, without resistance or fear of retaliation from doing so.

We are open to any concern that you may have, on suspicion or identification of acts inside or outside of the Organization, that are against our Code, state laws and regulations. You are encouraged to report cases, such as:





SPEAK UP: Report Compliance Concerns

The [Speak Up](#) reporting channel is available 24/7, 365 days a year and provides confidentiality through a secure end-to-end submission process (full anonymity is ensured).

- Breaches of human rights, including harassment (intimidation, discrimination, abuse, sexual, racial, or otherwise), child labor and acts or threats of physical violence.
- Situations which put at risk the health & safety of individuals, including an unsafe work environment, hostile working conditions and excessive work hours.
- Financial and accounting violations such as asset misappropriation, including financial manipulation or falsification of corporate documents (such as invoices or operational expenses lists).
- Corruption or other criminal offences, including bribery, conflicts of interest and insider trading practices.
- Breaches of competition and state aid rules.
- Situations which result in a risk to the privacy of individuals or the public.
- Actions which can inflict serious damage to the environment (excessive pollution, misappropriation of harmful materials).
- Actions which harm consumer protection.
- Actions that may negatively impact Printec's reputation (untrue or deliberate posts on social media, exposure of strictly internal corporate issues to the public, etc.); and / or
- Actions which are intended to hide or preserve any of the above.

3.3

Using the company assets



What are company assets?

Company Assets refer to all resources, both tangible and intangible, owned, controlled, or utilized by an organization to produce value and achieve its business objectives. These assets can be categorized into several types including but not limited to:

- i. Physical Assets:** Tangible items such as buildings, machinery, equipment, vehicles, office furniture, computers, and inventory.
- ii. Financial Assets:** Monetary resources like cash, bank accounts, investments, receivables, and securities.
- iii. Intellectual Property:** Intangible assets including patents, trademarks, copyrights, trade secrets, and proprietary technology.
- iv. Human Resources:** The collective skills, expertise, and experience of the company's employees and workforce.
- v. Digital Assets:** Software, databases, digital records, online accounts, and any data stored electronically.
- vi. Reputational Assets:** The brand value, goodwill, and public image of the company.



Acceptable Use of Company Assets

- i. **For Business Operations:** Using computers, software, and other equipment for performing job duties, conducting research, and communicating with clients and colleagues.
- ii. **For Professional Development:** Utilizing training programs, educational resources, and company-funded courses to enhance job-related skills and knowledge.
- iii. **For Innovation and Improvement:** Leveraging intellectual property and financial assets to develop new products, improve services, and implement business strategies.
- iv. **For Client Services:** Using company vehicles and facilities to provide services, meet with clients, and deliver products efficiently.
- v. **For Maintaining Security:** Employing digital assets and technologies to protect company data, ensure cybersecurity, and maintain the integrity of information systems.



Not Acceptable Use of Company Assets

- i. **For Personal Gain:** Using company funds, equipment, or facilities for personal projects, unauthorized personal expenses, or outside business ventures.
- ii. **For Illegal Activities:** Engaging in activities that violate laws or regulations, such as fraud, theft, or unauthorized access to confidential information.
- iii. **For Unethical Practices:** Actions that compromise the integrity of the company, such as falsifying records, misrepresenting the company's capabilities, or breaching client confidentiality.
- iv. **For Excessive Personal Use:** Overusing company resources for personal matters, like excessive personal phone calls, printing personal documents, or using company vehicles for non-business-related travel.
- v. **For Negligence:** Careless handling of company assets that leads to loss, damage, or decreased functionality, such as failing to maintain equipment properly or ignoring security protocols.

3.4

Responsible travel and entertainment



If you are required to travel on business, you must follow our Corporate Travel Guidelines/Policy at group and/or country level. Ensure that travel and entertainment expenses on behalf of the Company are undertaken with appropriate approval and documentation.

The Travel Guidelines/Policy applies to all Printec employees and noncompliance with the guidelines will result in non-reimbursement as well as in cases of serious violations and disciplinary actions. When planning your travel, try to find the right balance between business needs, environmental impact, financial costs, your safety, and well-being.

Do not go to places that would reflect negatively on the Company such as sexually oriented businesses/venues. These venues are not acceptable for business entertainment even if expenses are not submitted for reimbursement.

3.5

Relationships with Relatives, Friends, and Personal Connections

To avoid conflicts of interest, employees must be careful when business relationships involve relatives, friends, or significant others. Personal ties can affect decisions or compromise company integrity.

Definitions

A 'relative' includes family members living with or financially dependent on you. Close connections, like friends or romantic partners, may also create conflicts.



Managing Conflicts

- Avoid business or employment decisions involving close connections.
- Do not manage or influence decisions about relatives or close connections.
- Disclose third-party relationships involving relatives or significant others.
- Report romantic relationships that may create conflicts to HR or management.



Professionalism

Employees must maintain professionalism, avoid favoritism, and ensure personal relationships do not interfere with work.



Consequences

Failure to disclose conflicts or biased actions may result in disciplinary measures, including termination.

3.6

Political activity



The Company respects and encourages your right to engage in personal political activity, but make sure that your personal participation in political activities is lawful and appropriate.

Importantly, we prohibit our employees from using the Company's name, reputation or assets in their political activities and interests.

You should not contact other employees during work hours to ask for or try to obtain political contributions or participation in any political activity.

If you decide to volunteer for a political campaign, do so in your own time and as an individual, not as a representative of the Company or in expense of working hours.



3.7

Communicating properly



We should always communicate in ways that demonstrate our values and enhance our reputation and brand. Communicate with customers, partners, and fellow employees with caution.

- Be extra cautious in your written communication, which includes print, electronic and online communications such as letters, presentation materials, email, texts, instant messaging, online chats, blogs, or posts on social networking sites.
- Be clear, respectful, objective, and professional.
- Do not use offensive, insulting, threatening or aggressive language, as well as anything that would embarrass or disparage Printec.
- Do not exaggerate, make broad generalizations, or speculate about matters with legal significance.
- Accept responsibility for the consequences of our own communication. It is our responsibility!

3.8

Outside speeches, presentations, and social media

Printec employees, who have been invited by third parties to present or give a speech outside the Company, must have prior written approval before accepting any such invitations.

Please ensure you obtain approval from the Group Marketing team and keep the Group Deputy CEO or Group Function Manager informed. Be extra careful when discussing with the Media/ Press and consult Group Marketing and the relevant Policies and Procedures (available in our Intranet Portal) for further guidance in these matters.



Individual contributions outside speeches and presentations

When you speak out on public issues or in a public forum as an individual, you should not give the appearance of speaking or acting as a Company representative. This is particularly important when you participate in social networking media.



3.9

Protection of Personal Data

As part of your work, you may have access to personal data – including information relating to employees of Printec’s customers and suppliers, and their end customers.



You may access, use, and share such data only to the extent necessary and relevant to fulfill your assigned job responsibilities and in accordance with Printec policies, local laws, and regulations. If you suspect any breach, theft, or unauthorized access of personal data, immediately report the incident to Printec’s Privacy Team. If you have any questions about the treatment of personal data, consult Printec Group DPO or email Printec’s Privacy Team.

The Group Data Protection Officer (DPO) has been appointed to monitor that Printec complies with the GDPR, as do Managers/Supervisors/Team Leaders in respect to data processing that takes place within their area of responsibility.



All Employees/Staff are responsible for ensuring that any personal data that Printec holds and for which they are responsible, is kept securely and is not disclosed to any third party unless that third party has been specifically authorized by Printec to receive that information and has entered into a confidentiality agreement.

Employees/Staff of Printec are also responsible for ensuring that any personal data about them and supplied by them to Printec is accurate and up to date.

Participation in Printec GDPR awareness & training program is mandatory.

Partners and any third parties working with or for Printec, and who have or may have access to personal data, will be expected to have read, understood and to comply with the Code and the Data Protection Policy.



Basic Identifiers

- Name: Full name, first name, last name, and middle name
- Address: Home address, mailing address, and or any other physical address
- Email address: Personal and professional email addresses
- Phone number: Personal and work phone numbers, including mobile numbers

Government identifiers

- Passport Number: Identification number issued on a passport or ID
- Driver's License Number: Identification number on a driver's license
- Social Security Number (SSN): Unique number assigned to individuals by the government

Online Identifiers

- IP Address: Internet Protocol address associated with an individual's device
- Cookies: Tracking information stored by websites on a user's device
- Social Media Profiles: Information from social media accounts, such as Facebook, Twitter, or LinkedIn profiles.

Financial Information

- Bank Account Details: Account numbers, routing numbers, and account holder names
- Credit Card Information: Card numbers, expiration dates, and security codes
- Transaction Records: Details of purchases, withdrawals, and transfers
- Credit Reports: Information on credit history and credit scores.



Health Information

- Medical Records: Information about past and present health conditions, treatments, and medical history
- Insurance Information: Health insurance policy numbers and details
- Genetic Information: DNA sequences and results from genetic testing

Employment Information

- Employment History: Previous and current job titles, employers, and employment dates
- Employee ID: Identification number assigned by an employer
- Salary Information: Details about wages, bonuses, and compensation
- Performance Reviews: Evaluations and feedback from supervisors

Behavioral Data

- Browsing History: Records of websites visited and online activities
- Purchase History: Details of items bought and purchase dates
- Location Data: GPS coordinates and travel history
- Communication Records: Logs of calls, messages, and emails

Contact Information

- Emergency Contacts: Names and contact details of individuals to be contacted in case of an emergency
- Professional Contacts: Business contacts and networking information



All processing of personal data must be conducted in accordance with the data protection principles as set out in Article 5 of the GDPR. Printec's policies and procedures are designed to ensure compliance with the principles.

Compliance with data protection legislation is the responsibility of all Employees/Staff of Printec who process personal data.

Printec ensures that data subjects may exercise their rights.

Contacting the Group DPO
Email: privacy@printecgroup.com

3.10

Information disclosure and dissemination; Confidentiality



Each employee has entered into a non-disclosure or confidentiality agreement and each employee must adhere to it.

If you have confidential information, you should store or safeguard it where unauthorized people cannot see or access it.

You should not discuss confidential information in public places.

When you make public statements, you should be careful not to disseminate information you have access to as part of your job.

A conflict of interest may arise even if you inadvertently or accidentally share or disclose such information. It is the responsibility of every employee to respect and maintain the security of all confidential and non-public information entrusted to him/her by the Company and its customers and suppliers, except when disclosure is authorized by Company management or required by applicable laws or regulations. A violation of this rule may result in disciplinary action.



Confidential information includes some of our most valuable assets, such as:

- i. New technology, trade secrets, pricing policies, new products development;
- ii. Software or computer programs;
- iii. Information about clients, vendors, market conditions or business events, personnel plans for management changes, personal information, any industrial, financial, commercial, scientific or technical information provided by the Company, that you have not been authorized to share in public;
- iv. Any non-public information concerning the Company's business, financial performance and/or results, prospects or potential corporate transactions;
- v. Any confidential non-public information provided by a third party;
- vi. Any personal information about the Company's customers, agents or Employees;
- vii. Business or strategic operating plans and outlooks, including merger, acquisition or divestiture plans;
- viii. Nonpublic financial information about Company or our employees, customers or business partners;
- ix. Nonpublic information about another organization or person that we learn about in the course of our job or as a result of our position and any information whose dissemination is putting the Company's image or the Company's partners at stake;

Information that the Company has made public, such as press releases, advertisements or documents filed with governmental regulatory authorities, is not confidential information.

3.11

Intellectual property



What are intellectual property rights?

Intellectual property rights are legally recognized as exclusive rights to creation of the mind. It could be knowledge and ideas that have commercial value and are protectable from imitation. Intellectual property includes brand names, discoveries, formulas, inventions, knowledge, software, logo, copyrights, patents, service marks, trade secrets, processes, designs, ideas, images, data etc. The quote of a company's or person's intellectual property is prohibited unless a written consent is validated.

- The Company respects the intellectual property of other companies and people.
- The use, sale, or other distribution of intellectual property in violation of license agreements or intellectual property is prohibited.
- Every employee of the Company is signing a confidentiality and data protection agreement, and this forms an inseparable part of his/her labor contract.

A Final Word

Thank you for reading our Code of Business Conduct and Ethics. We hope you find it useful in guiding your behavior and decisions as you carry out your daily activities at Printec.

The most updated version of the “Code” will always be available for all Printec employees and contractors at the company’s intranet portal. If you do not have access to the company intranet, kindly ask your Direct Manager, your local Human Resources Manager, the Group Compliance team members, or contact the Group Ethics Committee for more information.

Please also bear in mind that this is a guide to help you respond to various situations you may face at work that pose an ethical question and that this Code is not intended to address all ethical questions you may face in your work at Printec. Also, it is not intended to replace the various Group policies and guidelines (available in our Intranet Portal) that may address in a more precise or comprehensive way some of the themes mentioned in this Code.





Glossary

Accountability – an environment of oversight that ensures compliance with laws, procedures, and regulations, while promoting transparency, access to information and public integrity.

Anything of value – Anything that might have value to a government official, including cash, gifts, meals, entertainment, business opportunities, Company product, offers of employment and more. There is no monetary threshold; any amount could be construed as a bribe.

Bribe – A bribe is giving or offering to give anything that might have value to somebody on decision making position, including cash, gifts, meals, entertainment, business opportunities or a company product in order to influence a decision. There is no monetary acceptable limit; any amount could be construed as a bribe.

■ **Active bribery:** Offering, promising, or giving anything of value to improperly influence another in order to obtain or retain business for the Company or to gain an advantage for an individual.

■ **Passive bribery:** Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the obtaining or retaining of business by the Company.

Code of Business Conduct and Ethics – A central guide and reference to assist day-to-day decision making. It is meant to clarify an organization’s mission, values, and principles, linking them with standards of professional conduct. As a reference, it can be used to clarify standards, organizational values, and policies; promote effective decision-making; and direct users to identify relevant ethics-related resources within the organization.



Glossary

Company assets – Includes, among other things, the Company's money or product, employees' time at work and work product, computer systems and software, telephones, wireless communication devices, photocopiers, tickets to concerts and sporting events, company vehicles, proprietary information, and Company trademarks.

Conflict of Interest – A situation in which a person has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties.

Confidentiality – The obligation to keep information secret unless its disclosure has been appropriately authorized by the person concerned.

Corruption – The abuse of entrusted power for private gain. Perversion or destruction of integrity in the discharge of duties by bribery or favor or the use or existence of corrupt practices.

Discrimination – Occurs when a person, or a group of people, is treated in a negative way or less favorably than another person or group, based on immutable characteristics, because of their age, race, national or ethnic origin, sex, sexual orientation, pregnancy, marital status, disability, religion, sexual preference, or some other characteristic.

Ethical Dilemmas – Challenging situations that require involving competing sets of values.

Ethics – Based on core values and norms, a set of standards for conduct in government, companies and society that guides decisions, choices, and actions.

Ethics Culture – The extent to which employees at all levels are committed to doing what is right and successfully upholding values and standards. Ethics culture includes ethical leadership (tone at the top); supervisor reinforcement of ethical behavior; and peer commitment to support one another in doing right.



Glossary

Ethics Risk – Potential for harm to an organization caused by misconduct that goes undetected and persists due to lack of management awareness and action.

Fair Trading – Conducting business in a fair, honest and ethical manner, avoiding deceitful or unfair practices

Favoritism – Favoritism is the unfair preference given to certain people over others, often based on personal relationships or biases rather than merit.

Governance – The act, process or power of exercising authority or control in an organizational setting. 'Good' governance is characterized as being participatory, accountable, transparent, efficient, responsive, and inclusive, respecting the rule of law and minimizing opportunities for corruption.

Group Ethics Committee – A committee comprised of senior leaders representing corporate governance functions and operations, responsible for monitoring the compliance with this

Code within the Group, advising any employee on any issue regarding the Code's requirements and investing situations that could be a violation of the Code or the applicable laws, rules, or regulations.

The Group Ethics committee is available to answer any questions about the Code of Conduct or Company compliance policies, or to discuss any concerns you may have about potential code violations.

Harassment – Any form of unwanted and unwelcome behavior which may range from unpleasant verbal remarks to physical contact or violence. Harassment covers a wide range of conduct - from direct requests of sexual nature to insults, offensive jokes, which results in a hostile work environment. It comprises unacceptable behavior, actions or comments that humiliate, or cause embarrassment, and any act such as intimidation or threat.

Integrity – Acting according to moral or ethical principles or values.



Glossary

Intellectual Property – Legally recognized property pertaining to the products of intellectual activity, such as creative works or inventions. Forms of intellectual property include copyrights on creative works and patents on inventions.

Nonpublic information – Any information that the Company has not disclosed or made generally available to the public, which may include information related to employees, inventions, contracts, strategic and business plans, major management changes, new product launches, mergers and acquisitions, technical specifications, pricing, proposals, financial data, and product costs.

Non-retaliation – A Code of Business Conduct and Ethics typically includes a non-retaliation policy to protect employees who report concerns in good faith. This policy encourages a culture of transparency and accountability, ensuring that employees feel safe to report unethical or illegal activities without fear of adverse consequences. Employees are encouraged to report any instances of retaliation to their Human Resources department or through other designated reporting channels within the organization. Employers are responsible for investigating claims of retaliation promptly and taking appropriate corrective action if necessary.

Reputational Risk – Potential for harm resulting from the loss of stakeholder trust.



Glossary

Transparency – an environment of openness where the access and disclosure of information is a matter of principle and human rights. Leaders, officials, and those in power operate in a visible and predictable manner that promotes trust and participation. Transparency is widely understood as a necessary precondition to prevent corruption and promote good governance and sustainability.

Values – The core beliefs we hold regarding what is right and fair in terms of our actions and our interactions with others. Another way to characterize values is that they are what an individual believes to be of worth and importance to their life.

Whistleblower – Any employee who reports suspected illegal or unethical activity observed in the workplace, such as violations

of the law, corruption, harassment, fraud, health/safety violations etc. Whistleblower protection refers to the measures (administrative or legislative) taken to shield the informer from physical, social, and economic retaliation.

Workplace bullying – Is defined as the repeated unethical and unfavorable treatment of one person by another in the workplace, which may be considered unreasonable and inappropriate workplace practice. Bullies usually utilize power attributed to their status, skills, or position in the workplace, and both men and women can be the targets and/or the perpetrators. Workplace bullying can occur between an employee and a manager or supervisor, or between co-workers. Bullying behavior can range from obvious verbal or physical assault to very subtle psychological abuse.



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what you
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