

**MIMEO.COM, INC.**

**SUPPLY CHAIN CODE OF CONDUCT POLICY AND  
MONITORING AND REMEDIATION PROCEDURES**

**October 28, 2019**

Mimeo.com, Inc. on behalf of itself and its affiliate and subsidiary companies (“*Mimeo*” or “*we*”) is a leader in providing print on demand, photo products, warehousing, kitting, e-publishing, and document distribution services. The very nature of our business (assuring the security, availability, and production of our customers’ materials) require a global culture of responsibility. This Supply Chain Code of Conduct Policy establishes standards to ensure that working conditions within the printing industry supply chain are safe, that workers are treated with respect, and that all business operations are environmentally responsible and conducted ethically. All of Mimeo suppliers, vendors, subcontractors, those whom work for us and or work on our behalf (“*Participants*”), must comply with Mimeo’s Supply Chain Code of Conduct Policy.

Mimeo does not tolerate corruption or bribery, and seeks to eliminate all related activity that hinders economic and social development, including but not limited to – integrity, safety, and environmental sustainability. Mimeo acts in accordance with all applicable local, federal, and international laws and regulations, and does not, directly or indirectly, accept or solicit undue payments or other considerations of monetary value that are given for the intended purpose of inducing action.

As a corporation whose operations span the globe, Mimeo must conform with the various laws and regulations applicable to our business. This Supply Chain Code of Business sets the minimum requirements for ethical conduct of any participant within our printing supply chain. All Participants of our supply chain must comply with either this Code or their local laws, whichever is more restrictive.

This Code is comprised of 5 sections.

- A. **Environmental Standards.** Our commitment to the environment include efficient use of resources and interior construction procedures, and strict compliance with all local, national, and international (if applicable) environmental regulations. This commitment extends to all suppliers, vendors, subcontractors, those whom work for us and / or work on our behalf.

All Participants are required to:

- (i) Comply with all applicable laws, regulations, and customer requirements of the countries in which they operate regarding prohibition or restriction of specific substances, including the labeling, recycling and disposal;
- (ii) Maintain and keep current all required environmental permits, approvals and registrations must be obtained, and their operational and reporting requirements are to be followed;

- (iii) Balance the social, economic and environmental aspects of their business, and minimize their negative impact on the environment; and
- (iv) Identify and manage any chemicals and other hazardous materials if released into the environment.

**B. Human Rights & Social Performance.** Mimeo's dedication to ethical business practices and advancing human rights is in accordance with the Universal Declaration of Human Rights and we uphold these proclamations to protect those who work for and with us. Human Rights & Social Performance Policy must be shared by all of our Participants and each Participant must agree to the following:

- (i) To maintain a workplace free of harassment and unlawful discrimination and to never subject employees to such discrimination including verbal, sexual, physical harassment, or any other form of abuse. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to employees;
- (ii) Treat all employees with dignity and respect, providing safe and healthy working environment; and
- (iii) Never use any child or forced labor.

**C. Inclusion & Diversity.** We retain diverse Participants, and are committed to non-discriminatory treatment regarding hiring, training, compensation, promotion, termination and disciplinary action. We mandate the same from our suppliers, vendors, subcontractors and any other individuals or entity whom work on our behalf.

**D. Health & Safety Policy.** All individuals and entities with whom we conduct business must meet and document our Health & Safety standards. We take all the necessary steps to ensure the health and safety of our personnel, business relations, and public. Our Health and Safety standards are in compliance with government legislation and our Participants must exhibit the same attention and care for personnel health and safety. Failure to comply with emergency and hazardous material spill responses will result in investigation and corrective action. See our Health & Safety Policy for additional information relating to this matter.

**E. Anti-Corruption / Ethical & Legal Requirements.** Mimeo requires the highest standards of integrity in all business interactions between Mimeo and the Participants and its personnel. In order to foster the trust of our customers, we have established a comprehensive Anti-Corruption Policy that prohibits the solicitation or acceptance of gifts that may influence an employee's decisions during a bid process or increase chances of business relationships with customers. Our Participants must comply with the Ethical & Legal Requirements of this Code by not providing, offering, requesting, or receiving kickback, directly or indirectly, or ever engaging in any form of bribery to any other party.