

National Pen SUPPLIER CODE OF CONDUCT

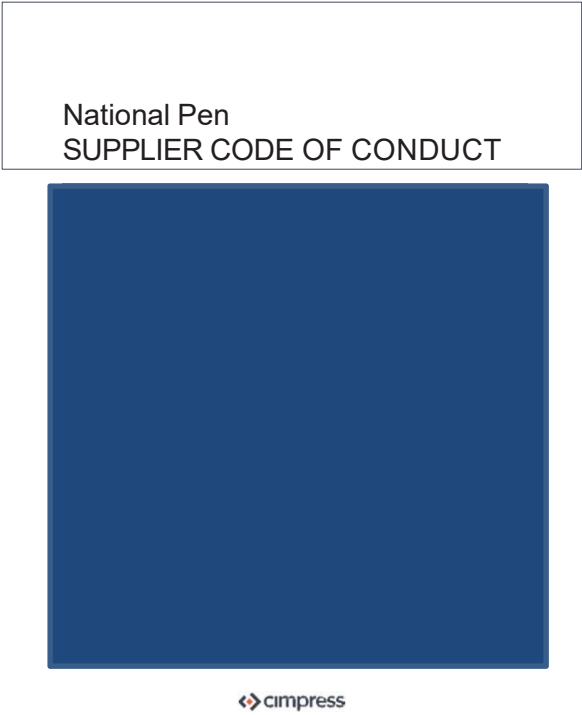
March, 2017



> Contents

General	3
Applicability	4
Immediate Communication	4
Compliance With Laws	5
Harassment-Free Work Environment	5
Honest and Ethical Conduct and Fair Dealing	5
Open and Fair Competition	6
Protecting the Environment	6
Workplace Safety	6
Gifts and Gratuities	7
Anticorruption and Bribery	7
Forced or Child Labor	7
Wage, Benefits and Working Hours	8
Accurate Books and Records	8
Confidential Reporting Helpline Numbers and Websites	9
Supplier Certification	10

3



To All National Pen Suppliers:

Integrity, safety and quality are critically important to National Pen. It is essential that our supply chain demonstrate these qualities as well. We owe this to our employees, customers, investors and communities around the globe. To ensure ethics and integrity across our business, we insist that members of our supply chain endorse our values on business ethics, environmental sustainability, labor and employment, and fair-trade practices. Our Supplier Code of Conduct outlines our expectations on how our suppliers should work when partnering with National Pen anywhere in the world.

> General

Our Code of Business Conduct spells out our own commitment to doing business not only legally, but also ethically and with integrity. In furtherance of that commitment, it is essential that National Pen works only with suppliers who follow the same standards regarding lawful and ethical behavior and who act with the highest standards of integrity.

National Pen is committed to ensuring that all of its suppliers act in full compliance with the laws, rules and regulations of the countries in which they operate. It is also committed to ensuring that working conditions in National Pen's supply chain are safe, that manufacturing processes are environmentally responsible and that workers are treated with respect and dignity.

Acceptance of this Supplier Code of Conduct is a precondition for suppliers wishing to do business with National Pen. It must be accepted by every supplier intending to do business with National Pen anywhere in the world. Any references to National Pen in this Supplier Code of Conduct includes National Pen and any of its business units anywhere in the world.

This Supplier Code of Conduct is generally based on Social Accountability Standard 8000 (SA8000).

> Applicability

This Supplier Code of Conduct shall apply to all National Pen suppliers and their employees, officers and directors. Where we use the term “suppliers” in this Code, we are referring to National Pen suppliers as well as their next tier suppliers and/or subcontractors. Suppliers are responsible for ensuring that their next tier suppliers and/or subcontractors receive and are in compliance with this National Pen Supplier Code of Conduct. National Pen reserves the right to visit supplier facilities to assess compliance with this Code and audit each supplier’s records, policies and practices. Violation of this Code may result in immediate termination as a National Pen supplier. Doing business with National Pen means its suppliers accept these rules. Any objections to or failure to comply with any provision of this Supplier Code of Conduct shall be notified to National Pen in writing to the contacts listed below.

> Immediate Communication

- National Pen’ suppliers agree to inform National Pen immediately about any violations or potential violations of this Code or the law by their or National Pen’ employees, officers or directors.
- National Pen’s suppliers shall inform National Pen of any such violation by contacting National Pen’s Director of Procurement, Doug Monastero, 12121 Scripps Summit Dr., San Diego, CA 92131, USA., email doug.monastero@pens.com, and Cimpres, 275 Wyman Street, Waltham, MA 02451, Attn: General Counsel, email: legal.notices@cimpres.com.
- National Pen suppliers can also report any violations of law or this Code through the National Pen / Cimpres confidential helpline. The phone numbers and websites for the National Pen helpline in each country are listed on Appendix A. National Pen has a strict no retaliation policy for any reports made in good faith.

> Compliance with Laws

National Pen expects every one of its suppliers, as well as each of their employees, officers and directors, to comply with all laws, rules and regulations applicable to them wherever they do business.

> Harassment-Free, Coercion-Free Work Environment and Non-Discrimination

National Pen's suppliers shall not tolerate illegal employment discrimination, unlawful workplace harassment, inhumane treatment, threats of violence, corporal punishment or other forms of physical coercion. National Pen's suppliers shall not make any employment-related decisions based upon a person's race, color, gender, national origin, age, religion, citizenship, disability, medical condition, sexual orientation, marital status or any other basis protected by law.

> Honest and Ethical Conduct and Fair Dealing

National Pen has a business environment that reflects the highest standards of professionalism and ethical behavior and expects the same of its suppliers. National Pen's suppliers and their employees, officers and directors shall endeavor to deal honestly, ethically and fairly with their respective suppliers, customers, competitors and employees. Statements regarding their products and services shall not be untrue, misleading, deceptive or fraudulent. National Pen's suppliers shall not take unfair advantage of anyone through manipulation, abuse of confidential information, fraud or any other unfair-dealing practices.

> Open and Fair Competition

National Pen will not do business with suppliers who collaborate with their competitors to restrain competition or trade by engaging in activities like:

- agreeing to establish or maintain prices,
- dividing up markets, territories or customers, or
- discussing the boycotting of a third party.

National Pen's suppliers shall not discuss any of these topics with a competitor, no matter how casually.

> Protecting the Environment

National Pen strives to conduct business in an environmentally responsible manner and expects the same of its suppliers. National Pen expects its suppliers to comply with all environmental laws and regulations applicable to them or the products and services National Pen procures from them. In particular, National Pen suppliers shall ensure that emissions/discharges to air, land, and water are assessed, managed, and audited so as to ensure strict compliance with local regulatory limits and permits. National Pen's suppliers should also strive to improve their processes in order to advance environmental stewardship, particularly in the areas of deforestation and carbon emissions.

> Workplace Safety

National Pen is committed to providing a safe, healthy and secure work environment for all employees and expects the same of its suppliers. National Pen's suppliers shall not tolerate unsafe conditions or conditions that endanger their or National Pen's employees, contractors or visitors and shall comply with all health and safety laws and regulations applicable to them. In particular, National Pen suppliers shall ensure that they have adequate engineered systems and administrative controls in place to protect life safety and prevent severe injury and chronic illness to all people in their facility. National Pen suppliers shall ensure that adequate fire detection and suppression equipment, building ventilation, and emergency medical response resources and personnel are in place. In addition, suppliers are required to ensure that their facilities are designed, permitted, used, and maintained in a manner consistent with their manufacturing processes.

> Gifts and Gratuities

National Pen values professional objectivity in our business relationships. Neither National Pen's suppliers, nor any of their employees, officers or directors, shall offer any National Pen employee, officer and director or member of their immediate families any gifts, gratuities or other favors before or while doing or seeking to do business with National Pen. If any National Pen supplier pays for any meals or business entertainment for National Pen employees, officers, directors, it must ensure that the meal or entertainment is reasonable, not lavish and for the purpose of conducting or discussing legitimate business matters.

> Anticorruption and Bribery

Neither National Pen's suppliers, nor any of their employees, officers and directors shall offer, give, solicit or receive bribes or kickbacks of any kind whatsoever anywhere in the world.

> Forced or Child Labor

National Pen's suppliers shall not use forced, compulsory or child labor in any of their own or their business partners' facilities. For these purposes (a) "forced or compulsory labor" is all work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation or that is demanded as a means of repayment of debt, and (b) a "child" is any person under 15 years of age, unless the minimum age for work is higher by local law, in which case that higher age applies in that locality.

Work shall not interfere with any compulsory schooling. Suppliers shall not retain or withhold workers' original, government-issued papers or travel documents.

> Wage, Benefits and Working Hours

National Pen's suppliers must pay their workers at least the minimum wage required by applicable laws and provide all legally mandated benefits. Suppliers shall not make deductions from employees' wages for disciplinary purposes, except as permitted by local law. National Pen's suppliers must pay their workers in a timely manner, and the basis on which they are being paid must be clearly conveyed to them. National Pen's suppliers shall comply with applicable laws and regulations regarding working hours for employees. All overtime work shall be voluntary and paid in accordance with local law.

> Accurate Books and Records

National Pen's suppliers must maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Revised: March, 2017

> Confidential Reporting Helpline Numbers and Websites

Australia	1-800-099-138	cimpress.alertline.com
Austria+@	0800-200-288/855-225-7061	cimpresseu.alertline.com
Belgium+@	0800-100-10/855-225-7061	cimpresseu.alertline.com
China	4008800624	cimpress.alertline.com
Canada	855-225-7061	cimpress.alertline.com
Czech Republic@	800-144-309	cimpresseu.alertline.com
France@	0800-91-6366	cimpresseu.alertline.com
Germany+@	0800-2255-288/855-225-7061	cimpresseu.alertline.com
Hong Kong	800-90-3803	cimpress.alertline.com
India+	000-117 /855-225-7061	cimpress.alertline.com
Ireland+@	00-800-222-55288(UIFN)/855-225-7061; 0-800-89-0011(Northern)/855-225-7061; 1-800-550-000/855-225-7061	cimpresseu.alertline.com
Italy@	800-785-500	cimpresseu.alertline.com
Jamaica	1-888-240-1687	cimpress.alertline.com
Japan#	00531-11-0298 (KDDI) 0066-33-830527 (NTT) 0034-800-600165 (Softbank)	cimpress.alertline.com
Mexico	001-844-376-3328	cimpress.alertline.com
Netherlands+@	0800-022-9111/855-225-7061	cimpresseu.alertline.com
Philippines	800-111-10915	cimpress.alertline.com
Spain+*@	900-99-00-11/855-225-7061	cimpresssp.alertline.com
Switzerland+@	0800-890011/855-225-7061	cimpresseu.alertline.com
Tunisia*^@	001-704-552-8188	cimpresssp.alertline.com
United Kingdom@	0808-234-0677	cimpresseu.alertline.com
United States	855-225-7061	cimpress.alertline.com

+ Where two sets of numbers are listed on the same line, dial the first set of numbers and wait for the tone. Then dial the second set of numbers.

* Anonymous reporting is not permitted by law in Spain or Tunisia. You will be asked to provide your identity when calling from these countries.

^ In Tunisia, this will be a collect call. Once you have an outside line, dial the operator and wait. Once the operator is on the line, ask to place a collect call to the US and read the helpline number. After the number has been dialed, you will hear a recording that says “Yes, we will accept the charges” twice. You will then hear a greeting asking you to select the language you would like to speak.

@ In the EU countries and Tunisia, you will only be permitted to report financial-related matters (financial, auditing, accounting, banking, anti-bribery).

In Japan, call the line consistent with your phone service provider.

SUPPLIER CODE OF CONDUCT

> CERTIFICATION <



Supplier has read and understood the National Pen Supplier Code of Conduct and agrees to comply with the terms of the Code. Supplier acknowledges that failure to comply with this Code is grounds for immediate termination of its supplier relationship with National Pen.

Signature

Name of Supplier (Please Print)

Date of Certification

Location

Revised: March 2017