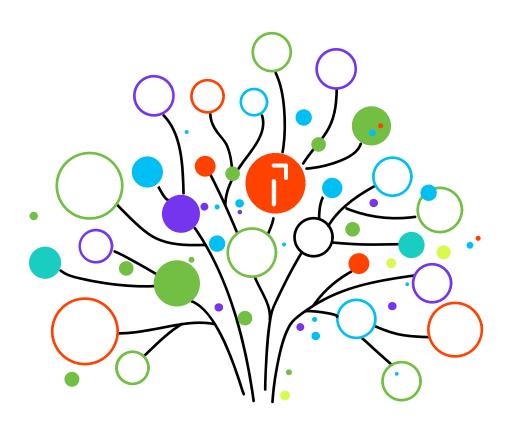


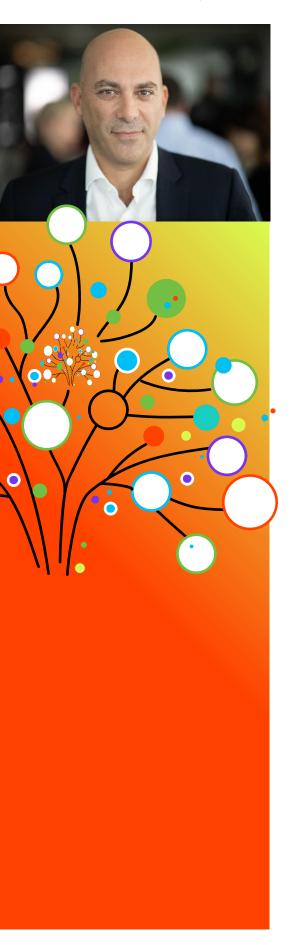
# QUADIENT CODE OF CONDUCT FOR BUSINESS PARTNERS



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# 1. Why this Business Code of Conduct?

Quadient is committed to doing business in a responsible, ethical and sustainable manner. As a signatory of the UN Global Compact, Quadient is committed to promoting the 10 fundamental principles addressing human rights, labour standards, environmental protection and anti-corruption. It is important to us that all our suppliers, service providers, agents, intermediaries, joint ventures, and distributors ("business partners") are dedicated to these same principles. They play an integral and major role in our business, and their actions are an extension of Quadient's own actions and reputation.

This Code of Conduct is designed to communicate the requirements that drive Quadient's sustainable business strategy. Its content is not new to our organization and our business partners. It is simply a better way to communicate in one document the principles we have in mind for doing business.

We encourage all third-party companies desired doing business with Quadient to become familiar with all these principles to help align their actions in ways that benefit us all. We expect from our business partners as well that their own suppliers share the same values and operate having the same principles in mind.

At Quadient, we will do business with partners who share our vision and values. Ensuring high standards in all dealings with our business partners remains an important business goal and part of our internal Code of Conduct.

As is our practice, business partners who do not follow the principles and expectations set forth in this document will not do business with Quadient. We will work with partners to establish proper action plans and timing to conform to any expectation(s) deemed needing improvement.

If you have grounds to believe that a provision of this Code of Conduct has been breached, you can use our <u>dedicated hotline or website</u>.

We look forward to work with you in a way that will enhance the performance of Quadient and its business partners as we both continue our long-standing commitment to create a better future.

Sincerely yours,

**Geoffrey Godet** 

**Chief Executive Officer** 

Geoffrey Godet

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# 2. Quadient's commitments to its Business partners

Our business partners play a key role in the growth and success of Quadient. It is therefore important to recall the commitments we make to them.

# Independence

In some countries and cultures, business gifts and entertainment may be seen as acceptable for the development of good working relationships with customers and other business partners. In such cases, we reject any gratuity or any gift other than symbolic from business partners nor other third-parties.

# Confidentiality and privacy of business partners data

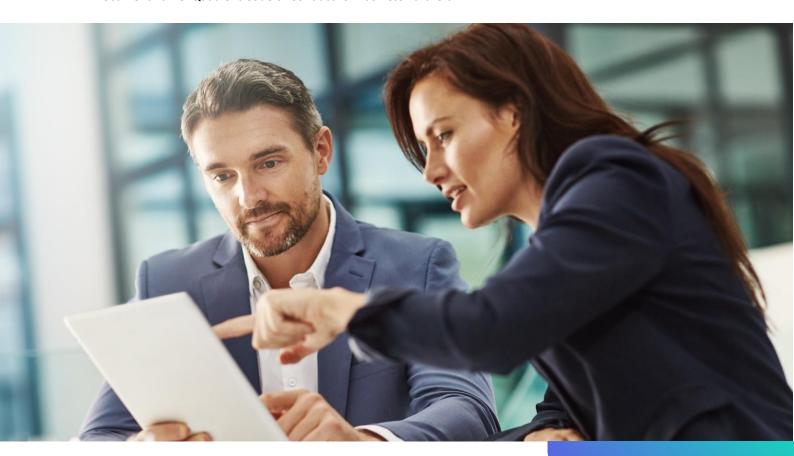
We protect confidential and personal information entrusted to us by our suppliers, agents, intermediaries, customers, and other business partners as carefully as we protect our own information. We are committed to processing your personal data in accordance with applicable data privacy laws and regulations. According to our data privacy policy, we collect, use, and retain personal data when it is necessary to ensure the effective operations of Quadient.

# Risk of mutual dependence

We endeavor not to create a situation of mutual dependence in terms of turnover, technology, and know-how with third-parties.



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### **Conflict of interest**

A conflict of interest may arise when engaging in a situation involving personal interests (or those of your family or relatives) with those of your company. Integrity in business relationships with our partners is an ongoing concern to which we pay particular attention. In this regard, all employees commit to avoid any form of conflict of interest. This applies particularly to managers who have been requested to sign each year the specific disclosure form as requested by the compliance department. In case of doubt about a potential conflict, employees are requested to disclose it to their managers.

#### **Equality and transparency**

We treat our business partners with honesty and respect. Regarding bids, we ensure that all bid offers are compared and considered fairly without favoritism. We do this by providing the same opportunities to everyone during the selection process, from selecting a new partner to the awarding of business. We select them according to predefined and transparent criteria and their ability to satisfy our requirements which include quality, price, capacity, service, reliability, technology, ethics and compliance.

# Whistleblowing

If you believe that a provision of our code of conduct for Business Partners has been breached, please feel free to use our <u>dedicated</u> <u>hotline or website</u>

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# 3. Business partners commitments required by Quadient

# Social responsibility

# **Forced labor**

All workers may join and leave a business partner employment of their own free will, provided they comply with any advance notice required by local law. Use of slave or indentured labor, requiring monetary deposits in order to work, or retention of identity papers or work permits for profit-making enterprises is not acceptable.

# Child labor and young workers

All workers must be at least the minimum working age, but not less than 16 years old, regardless of local regulations. Workers exposed to conditions that are hazardous to health and safety must be at least 18 years old.

# **Health and safety**

Quadient is committed to achieving a work environment free from occupational injuries and illnesses. We foster an environment in which all Quadient employees are expected to contribute to safety improvements by understanding their role and obligation to support occupational safety and health objectives, conform to Quadient's standards and comply with applicable safety and health regulations. Our business partners are expected to have a focus on safety and health that is consistent with ours. They are also expected to comply with all applicable international or local standards, regulations, and laws to ensure a safe and healthy workplace for their employees in order to prevent the risk of accidents or occupational illness.



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#### Harassment and violence

Quadient requires its business partners to treat all employees with dignity and respect and to protect them from harassment, intimidation and violence in whatever form in the workplace. Workers shall not be subjected to corporal punishment, mental or sexual coercion, physical contact, verbal abuse or the use of gestures, language or graphic materials that are threatening, abusive or exploitative.

#### Equal opportunity and non-discrimination

Quadient will not tolerate any form of discrimination from its business partners based on personal characteristics such as: age, race, gender, ethnic or social origin, nationality, language, religion, health, disability, marital status, sexual orientation, political or philosophical opinion, veteran or other status, trade union membership or other characteristics protected by applicable laws and regulations. We expect our business partners to treat employees fairly in matters affecting hiring, training, compensation, promotion, and termination.

#### Work hours and compensation

All workers shall be subject to working hours in accordance with applicable laws and regulations. Overtime shall be administered and compensated fairly and in accordance with local laws. Where no national legal standards exist, ILO standards shall apply. In all cases, a workweek may not exceed 60 hours (48 regular hours of work per week and a maximum of 12 hours of voluntary overtime) and workers shall be allowed at least one day off every seven days. All wages and fringe benefits must be defined and meet the legal and industry minimums.

#### Freedom of association and collective bargaining

Business partners shall openly communicate, build a constructive dialogue, and share ideas and concerns with their employees and workers' representatives regarding working conditions and management practices, without fear of discrimination, retaliation, intimidation or harassment. In accordance with applicable local laws, Quadient requires its business partners to respect the rights of employees to freely associate, join labor unions, seek representation, join works councils and bargain collectively, or refrain from doing so.

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# **Environmental stewardship**

# **Regulatory compliance**

Business partners shall comply with the applicable international standards and national regulations and laws regarding the protection of the environment. Quadient requires them to undertake initiatives to prevent, assess, mitigate and avoid the risks and impacts of their business activities on the environment.

# **Environmental management**

We expect our business partners to apply a policy to reduce its impact on the environment and take measures to protect the environment, both for its products and for its management system, especially in regard to nature conservation, preservation of biodiversity and eco-systems, depletion of natural resources, and management of waste and toxic substances. Suppliers must endeavor to limit nuisance caused to local residents, reduce energy consumption, discharges into water, air and soil, as well as waste generated at various stages of their activity, particularly in terms of packaging.

# Raw material ingredient transparency and disclosure

Suppliers procuring raw materials, semi-finished good and finished-good to Quadient shall have adequate systems in place to identify and disclose to Quadient chemicals in their components and parts that are deemed hazardous, toxic or carcinogenic and regulated by governments and competent authorities in the region. In particular, Quadient requires its suppliers to provide all necessary information intending to establish the compliance of Quadient products to ROHS REACH and the use of conflict minerals regulations and standards.

**RoHS**: Restriction of hazardous substances in electrical and electronic equipment

**REACH**: Registration, Evaluation and Authorisation of Chemicals



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# Compliance with ISO Standards

Quadient has implemented a management system based on the ISO 9001 (Quality management), ISO 14001 (Environmental management), ISO 27001 (Information Security) and ISO 45001 (Health & safety) principles and encourage its business partners to operate in compliance with those Standards or equivalent.

# **Production suppliers:**

According to our Purchasing and Industrial Partnership Policy, we expect our major and strategic production suppliers to be certified or at least be able to show an action plan to achieve certification within reasonable timing.

# Non-production suppliers and other Business partners:

While working with Quadient, major or strategic non-production suppliers and other Business partners are expected to operate in accordance with the aforementioned Standards. Quadient reserves the right to ask for such certifications as appropriate.

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# **Ethical practices**

# Compliance with applicable laws

Quadient expects and requires business partners to fully comply with applicable local, state, federal/national and international laws, rules, regulations, standards or codes.

### Fair dealing and anti competition practices

At Quadient, we are committed to fair dealing with our customers and our business partners. We treat them with honesty, fairness and respect. Quadient strictly prohibits from engaging in, or being complicit in, anti-competitive practices such as fixing prices, rigging bids or sharing markets, customers, and territories and expect the same from its business partners in return

#### **Anti-corruption**

Quadient has zero tolerance for improper payments or acceptance of bribes or kickbacks or creating the impression or suspicion of such. We expect the same of our Business partners. Therefore, they shall comply with all applicable anticorruption laws and regulations of the countries in which they operate, including but not limited to the *Foreign Corrupt Practices Act* (FCPA), *UK Bribery Act* and French *Loi Sapin II*, and applicable international anti-corruption conventions. Business partners are expected not to practice or tolerate any form of corruption, bribery, extortion, fraud, embezzlement or money laundering to obtain an unfair or improper advantage. Business partners must not offer to Quadient employees any gift or invitation of more than modest value or that may influence any business-related decision made by Quadient employees. Quadient prohibits any cash payment.

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#### Conflict of interest

Quadient employees avoid situations that may give rise to conflicts of interest or the appearance of conflicts of interest. Quadient demands the same of its Business partners.

# Confidentiality and privacy of Quadient data

Confidential and personal information related to Business partners relationships will be held in strict confidence and will not be shared with anyone outside a Business partner's company, unless otherwise agreed with Quadient.

When Quadient engages business partners to assist in the provision of services, such partners shall be subject to the same level of data protection and security as Quadient. As appropriate, Quadient shall regularly verify that its business partners satisfy these requirements.

# **Consumer safety**

Quadient is committed to ensuring the products it launches worldwide are substantiated as safe and compliant with all applicable regulatory requirements. Quadient products as well as those sourced from third-party manufacturers undergo safety and comprehensive risk assessment, including a review of available scientific and environmental data on product components and parts, and special consideration associated with their intended use. Quadient requires its business partners to provide all necessary information enabling us to protect the safety of our customers as well as the reputation of our brand.



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# **Contact us**

For additional information or guidance on this Code, please get in touch with your usual contact at Quadient or send an email to:

ethics compliance@quadient.com

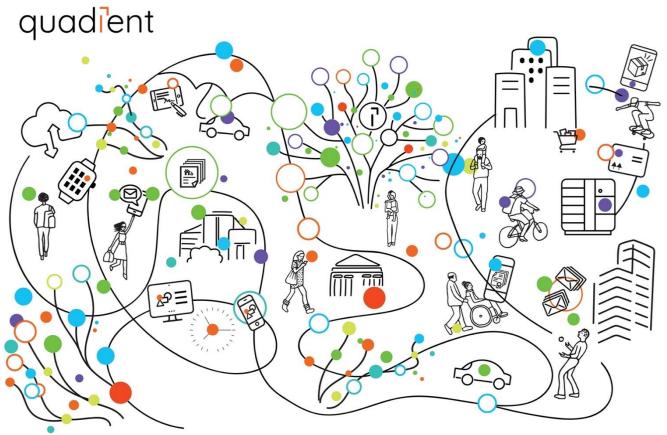
# Verification and continuous improvement

For all the requirements stated within this Code of Conduct, Business partners must establish mechanisms to ensure compliance within their company. We also expect them to communicate these requirements to their next-tier suppliers when relevant.

We conduct regular verification to ensure compliance with these requirements. This may take the form of documentary requests or annual performance reporting but also on-site assessments and audits by Quadient or by an authorized external party.

In case of non-compliance, we require the business partner to implement a corrective action plan that Quadient will monitor. In case of serious non-compliance breach or the absence of an action plan to ensure compliance, we reserve the right to disengage from the Business partner concerned.

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Because connections matter.

# About Quadient®

Quadient is the driving force behind the world's most meaningful customer experiences. By focusing on Intelligent Communication Automation, Parcel Locker Solutions and Mail-Related Solutions, Quadient helps hundreds of thousands of customers worldwide simplify the connection between people and what matters. For more information about Quadient, visit quadient.com.