

TOPPAN

TOPPAN MERRILL

Toppan Merrill Supplier Code of Conduct

Toppan Merrill is committed to personal integrity and ethical business practices. These are at the core of our company's values and drive our actions. We are committed to work in partnership, to maintain integrity, and to be accountable to ourselves and others. To support this, we have established a Code of Conduct to disclose to our business partners. We believe transparency with business partners honors our values, clarifies expectations and fosters relationships built on mutual trust.

Our Code of Conduct outlines the expectations that we have for our employees, our company and our suppliers with whom we do business.

Our Principles

Fair Dealing: No one should take unfair advantage of anyone through manipulation, abuse of privileged information, misrepresentation or concealment of material facts, or any other such practice. Anyone acting on behalf of Toppan Merrill may only gather competitive information in a lawful way.

Business Relationships and Business Gifts: Gifts must be nominal in value, limited in frequency, and not received with the intent or prospect of influencing business decisions, other than to foster general goodwill. Employees may attend supplier-sponsored dinners, provided the event is not lavish and occurs in conjunction with business discussions in a way that would not be perceived by others as influencing actions or decisions.

Tickets or fees paid for sporting, theater, concerts or other events may be accepted by Toppan Merrill employees only if they are not lavish and upon their manager approval. We prefer that the supplier providing the gift attends the event with the Toppan Merrill employee.

At Toppan Merrill's reasonable request, Toppan Merrill shall have access to supplier records for said expenses or gifts for purposes of an audit.

Bribery and Anti-Corruption: Toppan Merrill prohibits corrupt practices in any manner, including bribery and kickbacks, which are illegal and a violation of the law. Toppan Merrill expects our suppliers and their agents to act in compliance with all applicable laws and any applicable policies provided by Toppan Merrill.

Conflicts of Interest: A supplier doing business with Toppan Merrill must disclose any conflicts of interest they may have, or become aware of, while doing business with us.

Security and Confidentiality: We manage our own confidential and sensitive information as well as that of our clients and suppliers. This encompasses all non-public information about the companies, employees or clients. Using confidential information for any purpose other than providing goods and services to Toppan Merrill is prohibited.

Insider Information: It is illegal to trade any securities while in possession of material, non-public information. It is also illegal to communicate or "tip" such information to others. As a supplier who may

have access to insider information, you must remain in compliance with the confidentiality requirements contained in Toppan Merrill's standard terms and conditions, the law, New Supplier Setup documents and any executed Agreements.

Intellectual Property: Like you, we diligently protect our intellectual property. This includes patents, copyrights, trademarks, service marks and trade secrets. In accordance with this, all Toppan Merrill intellectual property may not be used without written authorization from Toppan Merrill.

Alcohol and Drugs: A safe, healthy work environment is critical to us, and this means that we ensure our workplaces are free from individuals working under the influence of drugs or alcohol. We explicitly prohibit the abuse of alcohol and any use of illicit drugs, intoxicants or controlled substances in any amount or in any manner on Toppan Merrill property.

Harassment and Bullying: Harassment and bullying is not acceptable. This includes sexual harassment and harassment based on characteristics protected by applicable law. Any harassment should be reported immediately and appropriate action will be taken.

Threats: Toppan Merrill will not tolerate threatening, hostile or abusive behavior by employees towards suppliers, or supplier's employees toward Toppan Merrill employees. We will take swift appropriate action against anyone who displays inappropriate behavior in the workplace.

Weapons and Damage to Property: Employees, guests and supplier personnel are explicitly prohibited from possessing or using any weapon, or using any tool or other material as a weapon, on Toppan Merrill property. Damage to property is also prohibited.