

4imprint Group plc
(the “Company”, “Group”, “4imprint”)



SPEAKING UP¹ AND NON-RETALIATION POLICY
With
UK Whistleblowing Addendum

04 August 2025

¹ There are laws in the UK that protect “whistleblowers” as defined in the law. For more information, see the 4imprint UK Whistleblower Addendum.

SPEAKING UP² AND NON-RETALIATION POLICY

4imprint Group plc and its subsidiaries (4imprint Direct Limited and 4imprint, Inc.) (together, “4imprint”) are committed to creating an environment of mutual respect and a community of belonging for all team members. Speaking up when we suspect misconduct or identify issues that are not in line with our culture makes us a better company. We protect 4imprint's reputation when we identify and resolve problems as early as possible.

The purpose of this policy is to support an ethical and open work environment, to ensure that 4imprint has governance and accountability structures that support its mission, and to encourage and enable team members to raise good faith concerns about illegal or unethical conduct.

This policy applies to all team members (including part-time staff, contractors, consultants and agents) with concerns about conduct that may violate 4imprint policies or core values, be illegal or unethical. Team members should not conduct their own investigations into such matters and are not responsible for determining fault or appropriate corrective measures. Individuals who are appropriately trained and have the necessary skills, experience, and objectivity are responsible for investigating all such concerns and recommending corrective action.

4imprint encourages team members to promptly report concerns regarding illegal or unethical conduct in the workplace or otherwise affecting 4imprint. Examples of illegal, unethical, dishonest, or unacceptable activities include, but are not limited to, such things as:

- Violations of federal, state, or local laws
- Theft or unauthorized removal or possession of company or another associate’s property
- Falsification of timekeeping or other company records
- Violation of safety and health regulations or standards
- Discrimination or harassment on any protected basis, including sexual harassment
- Unauthorized disclosure of business “secrets” or confidential information
- Fraud, bribery, or other financial misconduct

Team members are encouraged to raise their concerns to their supervisor, Human Resources, any manager, or a member of the local Executive Management team. 4imprint will investigate all reports promptly, fairly and in confidence. 4imprint will make every effort to keep the identity of team members reporting concerns secret. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

Other Reporting Options

4imprint values open and honest communications and encourages team members to pose questions or bring potential issues to the attention of their supervisor, Human Resources, any manager, or a member of the Executive Management Team whenever possible. The company recognizes that there might be circumstances when an individual prefers to raise a concern or make an inquiry anonymously. The Speak

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Up Connection, a platform operated by an independent third party, was established specifically to accommodate those situations.

The Speak Up Connection offers easy options to anonymously report concerns or pose questions.

Options to file a report through the Speak Up Connection include the following:

- Independently report issues via the internet at speakup.4imprint.com.
- Call toll free 1-800-461-9930 (US) or (0)-808-189-1053 (UK) to report the concern with the help of a call center representative.
- Text (920) 315-6663 (US)

Once a report has been submitted, it will be immediately forwarded to the appropriate 4imprint case manager and assigned to a trained and unbiased investigator. The subject of the report will not be given access to the report and will never be assigned to investigate it.

Associates contacting the Speak Up Connection will be provided with a confidential issue access number and will be asked to provide a personal password and security question. The access number and password allow the reporter to check the status of the report on the website, as well as send and receive anonymous messages pertaining to the report at any time. When a reporter provides a personal email address, they will receive email notifications through the platform as the report status is updated; the company will not have visibility or access to the email addresses of team members who prefer to remain anonymous. At the conclusion of each investigation, the reporter will receive notice of the outcome.

Policy Against Retaliation

At 4imprint, we foster a positive work environment based on openness, trust, and our core values. Every team member should feel comfortable reporting their concerns. Therefore, 4imprint will not tolerate retaliation against any team member who raises a good faith concern under this policy or who participates in the investigation of that concern. Any team member who believes they are being retaliated against should immediately contact a member of the Human Resources team.

Team members with questions regarding this policy should contact their immediate manager, a member of Human Resources, or a member of the Executive Management team.

UK Whistleblowing Addendum

1. **Introduction**

- 1.1 4imprint is committed to ensuring that any concerns expressed by employees in relation to criminal activity, breach of a legal obligation (including negligence, breach of contract, breach of administrative law), miscarriage of justice, danger to health and safety or the environment, sexual harassment, and the cover up of any of these in the workplace will be taken seriously and investigated.
- 1.2 4imprint is also committed to ensuring that 4imprint's employees are confident that they can raise any matters of genuine concern to them without fear of any negative action being taken against them as a result, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential. Any disclosure to the Company will be protected if the reporting party has an honest and reasonable suspicion that any of these activities has occurred, is occurring or is likely to occur. Employees who raise concerns reasonably and responsibly will not be penalised, and all efforts will be taken to keep the identity of any whistleblower confidential, to the extent permitted by applicable law.
- 1.3 This policy is intended to apply to all employees of 4imprint and for the purposes of this Policy, the reference to "employees" includes, for example, secondees, part-time staff, contractors and agents, regardless of the jurisdiction in which they operate.
- 1.4 This policy has been approved and adopted by the Company. The Board of Directors of 4imprint (the "Board") has overall responsibility for ensuring that the Policy reflects the Company's legal and regulatory obligations, that its adequacy and effectiveness are monitored and that it is effectively communicated to those who are required to comply with it.
- 1.5 This policy and associated procedures are voluntary and may be amended at 4imprint's sole discretion at any time. They do not form part of any employee's contract of employment.

2. **Guiding principles**

- 2.1 To assure employees that their concerns will be taken seriously, the Company will:
- (A) not allow any person raising a genuine concern to be victimized for doing so;
 - (B) treat victimisation of whistleblowers as a serious matter, which may lead to disciplinary action;
 - (C) not attempt to conceal evidence of poor or unacceptable practice; and,
 - (D) take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct;

3. What is whistleblowing?

- 3.1 Whistleblowing is the disclosure of information by an employee which relates to some danger, fraud or other illegal or unethical conduct in the workplace (collectively described as “misconduct”).
- 3.2 Whistleblowing is important because employees may, whilst carrying out their duties, have access to, or receive, information of a confidential nature which leads them to have concerns that some form of misconduct has taken place. Their terms and conditions of employment state that, except in the proper performance of their duties, they are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.
- 3.3 However, the law allows employees to make disclosures of certain information which would otherwise be prohibited.
- 3.4 No employee who raises genuinely held concerns in good faith in accordance with company policy will be dismissed or subjected to any detriment because of such action, and any other employee who victimises or retaliates against them for making a disclosure using the procedure set out in this document will be subject to disciplinary action.

4. What should be reported?

- 4.1 In general, the Company policy is intended to cover actions or omissions that an employee considers are illegal, materially contrary to policy or established procedure or outside the scope of an individual’s authority, actions which could seriously damage the Company’s reputation and conflicts of interest. However, only disclosures made “in the public interest” concerning actions falling strictly within the categories in paragraph 4.2 below may be eligible for protection under law (which may ensure that you will not face adverse consequences because of that disclosure).
- 4.2 A disclosure may be protected by law if it is one which an employee makes in the public interest because they are genuinely concerned:
- (A) that a criminal offence has been committed, is being committed, or is likely to be committed; or
 - (B) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject; or
 - (C) that a miscarriage of justice has occurred, is occurring, or is likely to occur; or
 - (D) that the health or safety of any individual has been, is being, or is likely to be, endangered; or
 - (E) that the environment has been, is being, or is likely to be, damaged; or
 - (F) that a person has been or is being sexually harassed; or

- (G) that information tending to show any of the above, is being, or is likely to be, deliberately concealed; or
- (H) that the business or any associated person has been, is being, or is likely to be receiving or offering bribes; or
- (I) that any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by 4imprint or any associated person.

5. How should a disclosure be made?

- 5.1 Any employee should initially take their concerns regarding the matters covered by this policy to their Manager or to a member of their local Executive Management team. There is no special procedure for doing this – they can tell him/her about the problem or put it in writing if preferred, but they should explain that they are using the Whistleblowing Policy and specify whether they would like their identity to be kept confidential.
- 5.2 If an employee feels it is inappropriate to make such a disclosure to their Manager, or if they raise a concern which they do not feel their Manager has dealt with properly, they should speak to a member of their local Executive Management team or directly to the Chief Financial Officer or to the Company Secretary.
- 5.3 If the disclosure is extremely serious or time critical, an employee should report it directly to the Chief Financial Officer or to the Company Secretary.
- 5.4 It is recognised that for some individuals, raising a concern under this procedure may be a daunting and difficult experience. Accordingly, other reporting options may be available locally, such as the confidential whistleblower hotline (www.speakup.4imprint.com).
- 5.5 An employee may choose to be accompanied or represented by their professional organization at any stage of the whistleblowing process.
- 5.6 All reported incidents will be investigated and will be dealt with in confidence, with only employees who need to know being informed. The Company hopes that an employee will feel able to discuss any concerns they have under this Policy openly. This helps to move the investigation on as swiftly as possible. If they want to raise a concern confidentially, the Company will make every effort to keep their identity secret. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose their identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in the Company's view such circumstances exist, efforts will be made to inform them that their identity is likely to be disclosed.
- 5.7 The individual raising the concern will be advised of the outcome of the investigation as soon as possible. If a longer period is needed for investigation, the employee will be informed.

- 5.8 In the case of disclosures on alleged fraud or corruption, the Chief Financial Officer or Company Secretary will inform the Chairman of the Company and the Chairman of the Audit Committee.
- 5.9 The Company will always endeavour to handle investigations promptly and fairly. However, if an employee is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the Chairman of the Company who will arrange any further investigation as he or she thinks appropriate.

6. Application of the Policy and Responsibilities Hereunder

- 6.1 This policy will apply to the Board, local Executive Management, Line Management, and all employees.
- 6.2 This policy has been approved and adopted by the Company. The Board of Directors of 4imprint (the "Board") has overall responsibility for ensuring that the policy reflects the Company's legal and regulatory obligations, that its adequacy and effectiveness are monitored and that it is effectively communicated to those who are required to comply with it.
- 6.3 Executive Management within is responsible for:
- (A) ensuring that the spirit, guiding principles, descriptions and definitions contained in this policy are applied locally;
 - (B) adapting this Policy to include any complementary local legal or governance requirements that fall within the scope of its spirit and guiding principles;
 - (C) deciding how and at what level disciplinary actions under the policy are applied, depending on the nature of business operations, the likely exposure of different employees to certain situations, and other mitigating factors; and
 - (D) ensuring that all relevant employees understand their obligations under this policy and are encouraged to raise any concerns that they might have about conduct in the workplace which does or could violate its provisions.
 - (E) encouraging any employee with questions about the content or application of the Policy to contact their Manager initially followed by escalation, as required, to Executive Management or the Board.

7. Reference

1998 Public Interest Disclosure Act