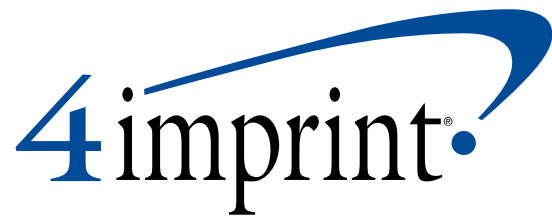


Forward Together



CODE OF CONDUCT

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A Message From Our CEO

Dear Team Members,

Believe it or not, starting a company is relatively easy. With enough passion and hard work and the right partners, most can get a new business off the ground and running for a few weeks, months or even years. The hard part is knowing how to move a business forward. Companies that endure are the ones that know where they are going and go there with purpose. They navigate competitive markets and adapt to unexpected challenges without losing sight of their values and purpose.

4imprint is that kind of Company.

Guided by our commitment to the “**Golden Rule**” — a belief in treating others as we would wish to be treated — and our eight core principles of **Honesty, Positive Attitude, Collaboration, Flexibility, Accountability, Empathy, Humility and Curiosity**, we have built a Company and a culture that celebrate integrity and hold themselves to the highest standards of conduct and quality. Every day, our team members embrace these principles. They inform the choices and actions we all make, and in doing so, keep us heading in the right direction.

Our Code of Conduct is here to guide us on our journey. Think of it as a roadmap. The pages ahead will elaborate on our core principles and set clear expectations designed to help you stay in compliance with our policies and the law. And when you hit a fork in the road, our Code can help you navigate ethical dilemmas, find answers to difficult questions and speak up about concerns.

Thank you for putting your very best into everything we do. Together, we will continue to lead 4imprint toward an even brighter and more successful future.



Kevin Lyons-Tarr
Chief Executive Officer

“OUR CODE OF CONDUCT
IS HERE TO GUIDE US ON
OUR JOURNEY.”



The “Golden Rule” and Our Core Principles

The Golden Rule

Our guiding principles start with the “Golden Rule” — to treat others as we wish to be treated. Being on the 4imprint team means bringing that philosophy to work with you every day. Supporting our belief in the “Golden Rule” are eight core principles that serve as our Compass and guide every 4imprint teammate:

Honesty

As the saying goes, “honesty is the best policy.” Creating environments of mutual respect and a community of belonging for all team members starts with a commitment to honesty and integrity. Trust is critical to both respect and success. And trust cannot be earned without honesty. Are you earning the trust of others? How do you go about earning their trust? Are your answers genuine and communicated in a manner that maintains a professional working relationship with one another? At the end of the day, can you look yourself in the mirror and others in the eye?

Positive Attitude

Positive attitudes create positive results — and a positive attitude is something each of us chooses to have. Do you approach challenges with solutions that benefit all parties involved? Do you look for the good in others? Do you seek to make a positive difference? Do you create positive experiences by your actions and word choices when working with others?

Flexibility

An open mind is open to endless possibilities. Change is necessary and inevitable. Do you embrace and recognize change as a part of growth? Are you willing to try new things? Can you adapt to new situations, different perspectives, and unfamiliar surroundings?

Collaboration

It’s a team game, and we need to build bridges to support one another for our common good. Can you make your case and express your needs in a way that connects with others in our organization and community? When an issue arises with someone, do you talk to them or about them? Do you willingly share your experience with others? Do you maintain and grow constructive relationships? Are you inclusive? Do you willingly lend a hand to help the team?

Accountability

Successful people and companies set high standards, have clear objectives and embrace accountability. Do you take responsibility for your actions? Do you set clear objectives for yourself? Do you use your time wisely? When you make a mistake, do you own up to it and apologize when your behavior had the opposite impact of what you intended?



Empathy

The ability to understand the experiences of others from their perspective is key to creating a feeling of belonging. It starts with kindness and takes practice, ongoing education and, most of all, a desire to listen and learn from others’ experiences, especially those that may differ from your viewpoint. When faced with a situation involving someone else, do you first try to understand their point of view? Can you recognize and acknowledge how you feel and manage these emotions effectively? Are you able to actively listen with an open mind? Do you learn how others’ experiences have shaped and impacted them?

Humility

It’s more meaningful when your actions or results cause others to sing your praises. Are your actions and results worth “singing about”? Humility requires recognition that success is rarely achieved alone and calls for giving credit where it is due. Do you give back more than you take? Do you look for ways to recognize the efforts of others and the difference they make?

Curiosity

Growing, learning, improving, creating, delivering all require healthy curiosity and an open mind willing to entertain differing viewpoints and experiences. If you want to learn something new, do you make time to read and research before offering an opinion? Do you seek out new opportunities and experiences? Do you actively search for input from others, especially those who may see the world differently from you? Do you ask for feedback? Do you share what you’ve learned with others?

Introduction to Our Code

Navigating Our Code

The work we do is all about leaving a mark. Every day, customers big and small turn to 4imprint to help them make an impression with our wide array of customized promotional products. But they are not the only ones leaving a mark. We leave ours through our commitments to accuracy, fairness, customer service and — above all else — integrity.

4imprint expects us to act with integrity in every action and interaction, making decisions that reflect our commitment to the Golden Rule and our core principles. In most situations, the right thing to do will hopefully be clear. But we understand that work can be complicated — so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Code of Conduct (“Code”) is your most important resource in this effort. It is designed with you in mind — a vital resource that will help you:

- *Promote integrity and the highest standards of ethical conduct.*
- *Address common ethical situations you could encounter in your work.*
- *Avoid even the appearance of anything improper in connection with our Company’s business activities.*

While comprehensive, our Code and policies can’t address every situation we may encounter. When you are unsure of what to do, consult our policies and other internal resources.



Introduction to Our Code

Complying With Laws and Regulations

4imprint is committed to compliance with all laws, rules and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, 4imprint also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and [seek help](#) when you need it.

We operate in multiple countries, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners and coworkers wherever they are, all team members must, at a minimum, comply with the standards and principles in this Code. If any guidance in our Code conflicts with a local law or requirement, you should seek guidance from upper management or the Legal Department.

Who Must Follow This Code

All team members of 4imprint, including executives, corporate officers and members of our Board of Directors, are required to read, understand and follow our Code.

Consultants, contractors, agents, suppliers, vendors and temporary employees ("business partners") who serve as an extension of 4imprint are also expected to follow the spirit of our Code, as well as any applicable contractual provisions. In addition, all of our preferred suppliers are expected to adhere to our Supplier Code of Conduct.

If you supervise our business partners, you are responsible for communicating our standards and ensuring they are understood. If a business partner fails to meet our ethics and compliance expectations or their contractual obligations, please notify a member of upper management, as it may result in the termination of our association with that business partner.

Accountability and Discipline

Violating our Code, our policies or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If you see or suspect a violation, [report it](#).

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with 4imprint. Violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.



Introduction to Our Code

Understanding Your Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what helps us succeed and grow.

Team Member Responsibilities

Each of us has a responsibility to:

- *Act professionally, honestly and ethically when conducting business on behalf of our Company.*
- *Know the information in our Code and Company policies, paying particular attention to the topics that apply to our specific job responsibilities.*
- *Complete all required team member training on time and stay up-to-date on current standards and expectations.*
- *Report concerns about possible violations of our Code, our policies or the law to your Leader, an executive or any of the resources listed in this Code.*
- *Cooperate and tell the truth when responding to an investigation or audit and never alter or destroy records in response to an investigation or when an investigation is anticipated.*

Additional Responsibilities of Leaders

4imprint Leaders are expected to:

- **Lead by example.** *Model high standards of ethical business conduct and help create a work environment that values mutual respect and open communication.*
- **Be a resource for others.** *Communicate often with team members and business partners about how the Code and other policies apply to their daily work.*
- **Be proactive.** *Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.*
- **Delegate responsibly.** *Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.*
- **Respond quickly and effectively.** *When a concern is brought to your attention, treat it seriously and with respect for everyone involved.*
- **Be aware of the limits of your authority.** *Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what is not), discuss the matter with your Leader.*

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies or the law.



Introduction to Our Code

Understanding Your Responsibilities

Consider This



- Q** - I am a Leader and not clear about what my obligations are if someone comes to me with a concern — and what if it involves a senior Leader?
- A** - No matter who the allegation involves, you must report it. 4imprint provides several options for reporting concerns. If, for any reason, you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code. You may also report your concerns anonymously through the [Speak Up Connection](#).
- Q** - I observed misconduct in an area not under my supervision. Am I still required to report the issue?
- A** - You are chiefly responsible for team members and business partners under your supervision, but all 4imprint team members are required to report misconduct. As a Leader, you have a special obligation to be proactive. The best approach would be to talk first with the Leader who oversees the area where the problem is occurring, but if this is not feasible or effective, you should contact another resource described in our Code.



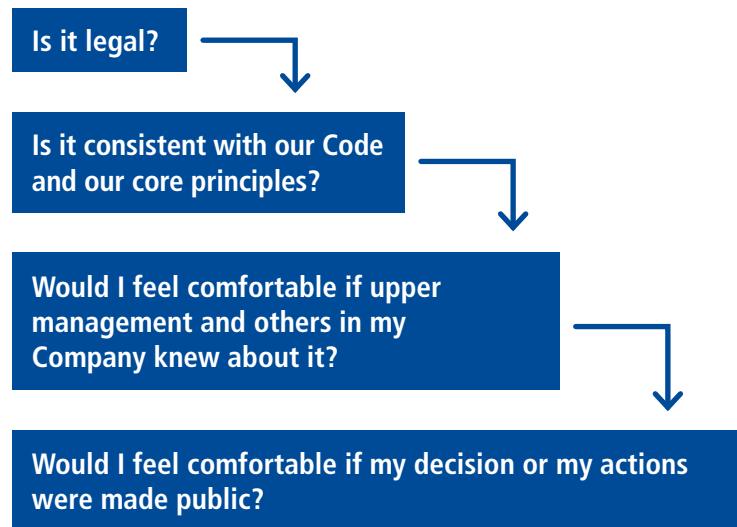
Introduction to Our Code

Making Good Decisions

Making the right decision is not always easy. There may be times when you will be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

Facing a Difficult Decision?

It may help to ask yourself:



If the answer to all of these questions is "**yes**," the decision to move forward is probably OK, but if the answer to any question is "**no**" or "**I am not sure**," stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies or our resources to better address a particular issue, bring them forward. Promoting an ethical 4imprint is a responsibility we all share.



Introduction to Our Code

Asking Questions and Speaking Up

If you see or suspect a violation of our Code, our policies or the law, or if you have a question about what to do, talk to your Leader.

If you are uncomfortable speaking with your Leader, there are other resources available to help you:

- *Contact another member of management.*
- *Contact Human Resources or the Legal Department.*
- *Contact the Speak Up Connection at SpeakUp.4imprint.com or call 1-800-461-9330 (U.S.)/ (0)-808-189-1053 (UK).*

4imprint will make every reasonable attempt to ensure that your concerns are addressed appropriately.

CONSIDER THIS



Q - I believe someone misused the Speak Up Connection by making an anonymous call and falsely accusing someone of wrongdoing. What should I do?

A - Report your concern immediately. Experience has shown that the Speak Up Connection is rarely used for malicious purposes, but it is important to know that we will follow up on reports about such conduct. Anyone who is determined to have used Speak Up Connection in bad faith to spread falsehoods or threaten others, or with the intent to damage another person's reputation, will be subject to disciplinary action.

What to Expect When You Use the Speak Up Connection

The Speak Up Connection web portal and phone line (and SMS texting in the U.S.) are available 24 hours a day, seven days a week. They are operated by an independent third-party provider of corporate compliance services; your concerns will be documented in detail and forwarded to 4imprint for further investigation.

When you contact the Speak Up Connection, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, 4imprint will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

WANT TO KNOW MORE?



→ [See our Speaking Up and Non-retaliation Policy for additional information.](#)

Introduction to Our Code

Committing to Non-retaliation

We will not tolerate any retaliation against any team member who, in good faith, asks a question; reports conduct that may be inconsistent with our Code, our policies or the law; or assists in an investigation of suspected wrongdoing.

What Does Reporting “in Good Faith” Mean?

It means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.



CONSIDER THIS



- Q** - I suspect there may be some unethical behavior going on in my business unit involving my Leader. I know I should report my suspicions, and I am thinking about using the Speak Up Connection, but I am concerned about retaliation.
- A** - You are required to report misconduct and, in your situation, using the Speak Up Connection is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, report it immediately. We take claims of retaliation seriously and are committed to enforcing our policy against retaliation. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

WANT TO KNOW MORE?



→ See our [Speaking Up and Non-retaliation Policy](#) for additional information.

Certainty for Our Team Members

Championing Inclusion

4imprint helps bring together team members with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. We are committed to ensuring that everyone in our workplace — team members, job applicants and business partners — feels welcome and valued and is given opportunities to grow, contribute and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income and advancement in all our departments, programs and worksites.

If you are responsible for making employment decisions on behalf of 4imprint, base your decision-making on qualifications, demonstrated skills and achievements — and never on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information or any other characteristic protected by law.

DO THE RIGHT THING



- *Treat others respectfully and professionally.*
- *Help create an environment where everyone is celebrated for their uniqueness.*
- *Do not discriminate against others on the basis of any characteristic protected by law or Company policy.*

WATCH OUT FOR



- *Comments, jokes or materials, including emails, which others might consider offensive.*
- *Inappropriate bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.*

CONSIDER THIS



- Q** - One of my coworkers sends emails containing jokes and derogatory comments about certain sexual orientations. They make me uncomfortable, but no one else has spoken up about them. What should I do?
- A** - You should notify your Leader or Human Resources. Sending these kinds of jokes violates our Values, our email usage policies and our standards on harassment and discrimination. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.

WANT TO KNOW MORE?



→ [See our Speaking Up and Non-retaliation Policy for additional information.](#)

Certainty for Our Team Members

Creating a Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying and abusive conduct. 4imprint does not tolerate verbal or physical conduct by any team member that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment.

If you see, suspect or feel you or a colleague have been the victim of harassment (including sexual harassment), report it immediately. You'll be helping to preserve a respectful and productive workplace.

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- *Actions that are unwelcome — such as a request for a date, a sexual favor or other similar conduct of a sexual nature — are made a condition of employment or used as the basis for employment decisions.*
- *An intimidating, offensive or hostile environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.*

DO THE RIGHT THING



- **Promote a positive attitude** — *support policies designed to build a safe, ethical and respectful workplace.*
- **Help each other** — *speak out when a coworker's conduct makes others uncomfortable.*
- **Be professional** — *do not visit inappropriate internet sites or display sexually explicit or offensive pictures.*
- **Speak up** — *report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.*

WATCH OUT FOR



- *Threatening remarks, obscene phone calls or texts, stalking or any other form of harassment.*
- *Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.*
- *The display of sexually explicit or offensive pictures or other materials.*
- *Sexual or offensive jokes or comments.*
- *Verbal abuse, threats or taunting.*

Certainty for Our Team Members

Prioritizing Health and Safety

Ensuring safety is an integral part of everything we do. Reporting risks and hazards is not just the right thing to do, it is a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for our Company and for every team member on the job, every day.

Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on you to actively promote a safe and healthy workplace and report any situations that may pose a health, safety or security risk. Do your part to keep everyone in the 4imprint family injury-free.



Workplace Violence

Violence of any kind has no place at 4imprint. We will not tolerate:

- *Intimidating, threatening or hostile behavior.*
- *Causing physical injury to another.*
- *Acts of vandalism, sabotage or other criminal activities.*
- *The carrying of firearms or other weapons onto Company property.*

DO THE RIGHT THING



- *Follow the safety, security and health rules and practices that apply to your job.*
- *Maintain a neat, safe working environment by keeping workstations, aisles and other workspaces free from obstacles, wires and other potential hazards.*
- *Notify your Leader immediately about any unsafe equipment or any work situation that could pose a threat to health or safety or the work environment. As a team member, you have the right and the responsibility to stop any work if you feel your safety is at risk.*
- *Cooperate with any investigations into incidents.*
- *Adhere to our policy on alcohol and drug use in the workplace.*

Certainty for Our Team Members

Prioritizing Health and Safety

WATCH OUT FOR



- *Unsafe practices or work conditions.*
- *Carelessness in enforcing security standards, such as facility entry procedures and password protocols.*

WANT TO KNOW MORE?



→ See our [Safety Handbook](#) for additional information.



CONSIDER THIS



- Q** - I've noticed some practices in my area that do not seem safe. Who can I speak to? I am new here and do not want to be considered a troublemaker.
- A** - Discuss your concerns with your Leader, the Safety and Security Director, or Human Resources. There may be very good reasons for the practices, or you may be bringing to light an issue that needs to be addressed. In either case, raising a concern about safety does not make you a troublemaker. It makes you a responsible team member who is concerned about the safety of others.
- Q** - A contractor commits a violation of our standards. Are contractors expected to follow the same health, safety and security policies and procedures as team members?
- A** - Absolutely. Leaders are responsible for ensuring that contractors and other business partners at work on 4imprint premises understand and comply with all applicable laws and regulations, as well as with additional requirements our Company may have.

Certainty for Our Team Members

Practicing Data Privacy

We respect the personal information of our team members and customers. We follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of sensitive information.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number or credit card number. Only use personal information for legitimate business purposes.

Our customers and business partners place their trust in us. We must protect their confidential information just as we protect our own.

Make sure you understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information that they provide to us.

DO THE RIGHT THING



- *Limit any access to third-party confidential information to those who have a need to know in order to do their job, and only for authorized purposes.*
- *Immediately report any loss or theft of confidential information to your Leader.*

WATCH OUT FOR



- *Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.*
- *Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.*
- *Failing to shred or securely dispose of sensitive information.*
- *Using "free" or individually purchased internet hosting, collaboration or cloud services that could put personal information at risk.*

WANT TO KNOW MORE?



- **See our [U.S.](#) and [UK](#) Privacy Policies for additional information.**

Certainty for Our Team Members

Communicating With the Public

4imprint is committed to maintaining honest, professional and lawful internal and public communications. We need a consistent voice when making disclosures or providing information to the public and must ensure that only authorized persons speak on behalf of 4imprint.

Refer any communications with the media, investors, stock analysts and other members of the financial community to upper management.

Every communication about our Company affects our reputation and our brand, so we take care online. We must never post anything that would be considered harassing or discriminatory, and we must never breach confidential information about our Company, our team members or our business partners.

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of 4imprint. If you believe a false statement about our Company has been posted, do not respond, even if your intent is to "set the record straight." Your posting might be misinterpreted, start false rumors or may be inaccurate or misleading. Instead, contact Human Resources or the Legal Department.

Full, Fair and Timely Disclosures

4imprint is committed to meeting its obligations of full, fair and timely disclosure in all reports and documents that describe our business and financial results and other public communications.

WATCH OUT FOR



- *Giving public speeches or writing articles for professional journals or other public communications that relate to 4imprint without appropriate management approval.*
- *The temptation to use your title or affiliation outside of your work for 4imprint without it being clear that the use is for identification only.*
- *Invitations to speak "off the record" to journalists or analysts who ask you for information about 4imprint or its customers or business partners.*



Certainty for Our Customers

Preventing Bribery and Corruption

4imprint is committed to complying with all applicable anti-corruption laws. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business, regardless of local customs.

Do not pay or accept bribes or kickbacks, at any time, for any reason. This applies equally to any person or company representing our Company. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. Never ask them to do something that we are prohibited from doing ourselves.

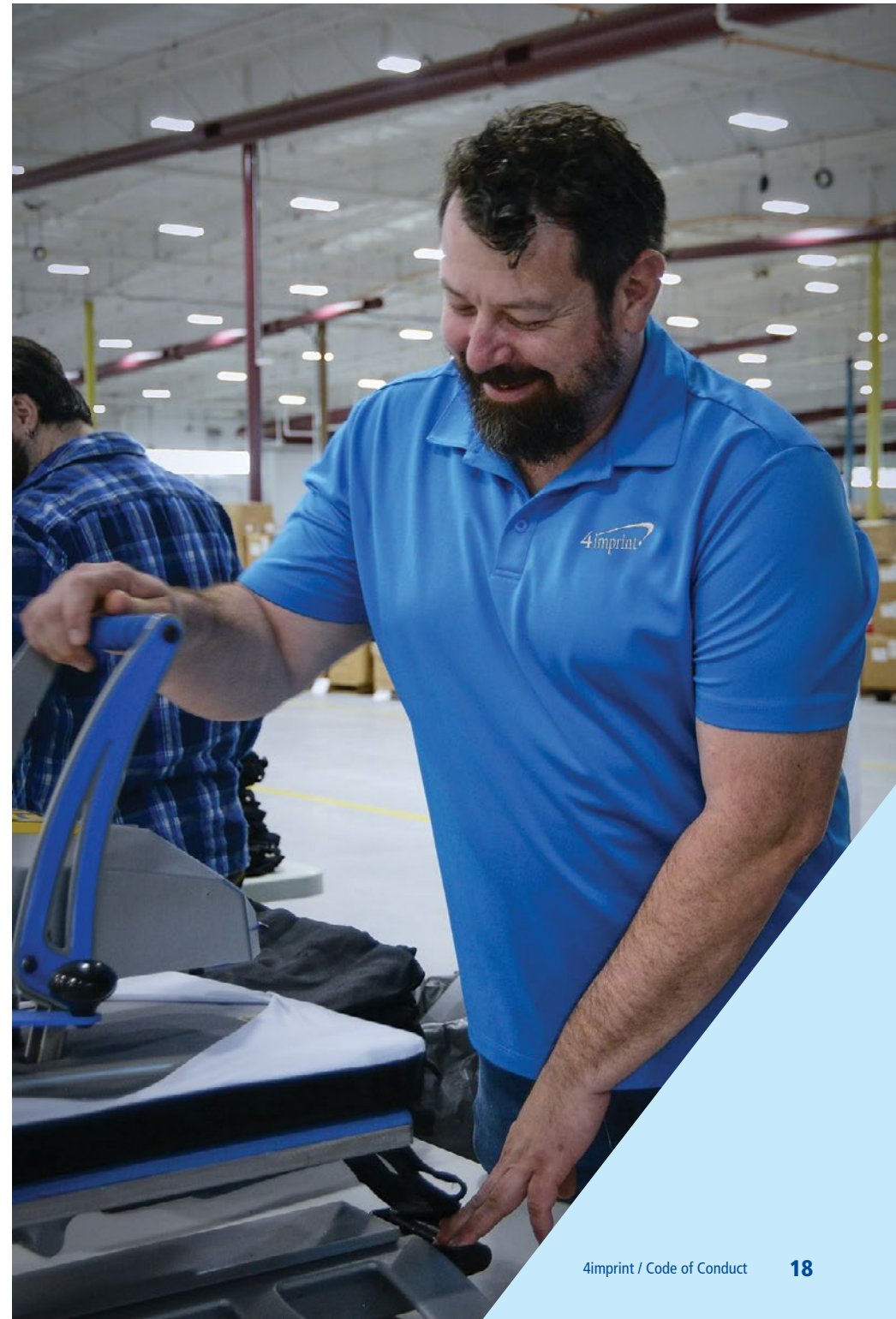
Key Definitions

Bribery means giving or receiving anything of value (or offering to do so) to obtain a business, financial or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

Government officials include government employees, political parties, candidates for office, employees of public organizations and government-owned entities.



Certainty for Our Customers

Preventing Bribery and Corruption

DO THE RIGHT THING



- *Understand the standards set forth under anti-bribery laws that apply to your role at 4imprint.*
- *Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.*
- *Exercise due diligence and carefully monitor third parties acting on our behalf, particularly when dealing in countries with high corruption rates and in situations where "red flags" would indicate further screening is needed.*
- *Accurately and completely record all payments to third parties.*

WATCH OUT FOR



- *Apparent violations of anti-bribery laws by our business partners.*
- *Agents who do not wish to have all terms of their engagement with 4imprint clearly documented in writing.*

WANT TO KNOW MORE?



→ **See the [4imprint Group Anti-Fraud, Bribery and Economic Crime Policy](#) for more information.**



Certainty for Our Customers

Acting With Integrity

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices.

Tell the truth about our services, capabilities and products, and never make claims that are not true. In short, treat our customers and business partners as you would like to be treated.

DO THE RIGHT THING



- *Be responsive to customer requests and questions. Only promise what you can deliver, and deliver on what you promise.*
- *Never take unfair advantage of anyone by manipulating, concealing or misrepresenting material facts, abusing privileged information or any other unfair dealing practice.*
- *Never grant a customer's request to do something that you regard as unethical or unlawful.*
- *Speak with your Leader if you have concerns about any error, omission, undue delay or defect in quality or our customer service.*

WATCH OUT FOR



- *Pressure from colleagues or Leaders to cut corners on quality or delivery standards.*
- *Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.*



Certainty for Our Customers

Maintaining Quality and Safety

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality, safety and performance of our products.

Each of us, as well as our business partners, is expected to meet all product quality and safety specifications and our customers' expectations.



DO THE RIGHT THING



- *Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or integrity of our services.*
- *Routinely check equipment and processes to ensure they conform to specifications and expectations — work toward continuous improvement.*
- *If you believe there is a safety issue or defect that might endanger a customer, report the issue to your Leader immediately.*

WANT TO KNOW MORE?



→ See our [Safety Handbook](#) for additional information.

Certainty for Our Customers

Avoiding Conflicts of Interest

A conflict of interest can occur whenever an employee has an interest or activity that may interfere with their ability to make an objective decision on behalf of 4imprint. Conflicts of interest may be actual, potential or even just a matter of perception.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflict of interest situations are not always clear-cut, so fully disclose them to your Leader so they can be properly evaluated, monitored and managed.

Potential Conflicts of Interest

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to 4imprint first. This means that you should not take that opportunity for yourself unless you get approval from a member of upper management.

Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your Leader to determine if any precautions need to be taken.

Outside employment

To ensure that there are no conflicts and that potential issues are addressed, always disclose and discuss outside employment or side businesses with your Leader. If approved, make sure the outside activity does not interfere or compete with your work at 4imprint. Working for a competitor, business partner or customer may raise conflicts that will need to be resolved.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner or customer. Make sure you know what is permitted — and what is not — by our policies and seek help with any questions.

Civic activities

Unless Company management specifically asks you to do so, you should not accept a seat on the board of directors or advisory board of any of our competitors, business partners or customers, especially if your current job gives you the ability to influence our relationship with them.

Certainty for Our Customers

Avoiding Conflicts of Interest

DO THE RIGHT THING



- *Avoid conflict of interest situations whenever possible.*
- *Always make business decisions in the best interest of 4imprint.*
- *Think ahead and proactively address situations that may put your interests or those of a family member in conflict with 4imprint.*
- *Discuss with your Leader full details of any situation that could be perceived as a potential conflict of interest.*

WANT TO KNOW MORE?



→ See our [Conflicts of Interest Policy](#) for additional information.



Certainty for Our Customers

Safeguarding Confidential Information

4imprint relies on employees to be vigilant and protect confidential information and intellectual property — some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Do your part to safeguard confidential information. Be aware that this obligation continues even after your employment at 4imprint ends.

Intellectual Property

Examples of intellectual property (IP) include:

- *Business and marketing plans*
- *Methods, know-how and techniques*
- *Company initiatives (existing, planned, proposed or developing)*
- *Innovations and designs*
- *Customer lists*
- *Systems, software and technology*
- *Trade secrets and discoveries*
- *Patents, trademarks and copyrights*

DO THE RIGHT THING



- *Properly label confidential information to indicate how it should be handled, distributed and destroyed.*
- *Use and disclose confidential information only for legitimate business purposes.*
- *Protect our intellectual property and confidential information by sharing it only with authorized parties.*
- *Only store or communicate Company information using 4imprint information systems.*

WATCH OUT FOR



- *Discussions of 4imprint confidential information in places where others might be able to overhear — for example, on planes and elevators, in restaurants and when using your phone.*
- *Sending confidential information to unattended devices or printers.*



Certainty for Our Suppliers

Working With Business Partners

4imprint evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements must be negotiated in good faith and be fair and reasonable for both parties.

Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that is consistent with our Code, our policies and our values.

Interacting With the Government

We are committed to meeting the many special legal, regulatory and contractual requirements that apply to our contracts with government entities. These requirements may apply to bidding, accounting, invoicing, contracting, employment practices, contract performance, gifts and entertainment, purchasing and other matters. These requirements may also flow down to individuals and companies working on our behalf.

If you are responsible for conducting business with the government on behalf of 4imprint, make sure you know and comply with what is contractually required as well as all laws and regulations that apply to our government-related work.



Certainty for Our Suppliers

Handling Gifts, Entertainment and Hospitality

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept gifts and entertainment that comply with our policies, and make sure that anything you give or receive is accurately reported in our books and records.

Government Officials

Be aware that the rules for what we may give to — or accept from — government officials are much more strict. Do not offer anything of value to a government official without obtaining approval in advance from the Chief Legal Officer. And remember: We do not accept or provide gifts, favors or entertainment to anyone — even if it complies with our policies — if the intent is to improperly influence a decision.



Certainty for Our Suppliers

Handling Gifts, Entertainment and Hospitality

DO THE RIGHT THING



- *Only provide and accept gifts and entertainment that are reasonable complements to business relationships.*
- *Never offer gifts to — or accept them from — a business partner with whom you are involved in contract negotiations.*
- *Make sure anything given or received complies with the Company policies of both the giver and the recipient.*
- *Never give or accept cash or cash equivalents.*
- *Do not request or solicit personal gifts, favors, entertainment or services.*
- *Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.*

WATCH OUT FOR



- *Situations that could embarrass you or our Company (e.g., entertainment at sexually oriented establishments).*
- *Gifts, favors or entertainment that may be reasonable for a privately owned company but not for a government official or agency.*

CONSIDER THIS



- Q** - When traveling, I received a gift from a business partner that I believe was excessive. What should I do?
- A** - You need to let your Leader know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to team members or donate it to charity, with a letter of explanation to the business partner.



Certainty for Our Suppliers

Preventing Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation and can expose our Company and the individuals involved to severe sanctions. We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes and anti-terrorism laws wherever we operate.

Be alert to the warning signs of money laundering. Report any suspicious financial transactions and activities to Internal Audit or the Legal Department.

WATCH OUT FOR



- *Attempts to pay in cash or in a different currency than shown on the invoice.*
- *Requests to ship to a country that differs from where payment originated.*
- *Avoidance of recordkeeping requirements.*
- *Payments made by someone who is not a party to the transaction.*
- *Unusual changes to a customer's normal pattern of transactions.*



Certainty for Our Investors

Keeping Accurate Records

The accuracy and completeness of our business records and financial disclosures are essential to making informed decisions and supporting investors, regulators and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some team members have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that any information you record is accurate, timely, complete and maintained in a manner that is consistent with our internal controls, disclosure controls and legal obligations.

Records Management

Documents should only be disposed of in compliance with 4imprint policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to — or in anticipation of — an investigation, audit or legal proceeding.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Legal Department.



Certainty for Our Investors

Keeping Accurate Records

DO THE RIGHT THING



- *Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.*
- *Write carefully in all business communications. Write as though someday the records you create may become public documents.*

WATCH OUT FOR



- *Records that are not clear and complete or that obscure the true nature of any action.*
- *Undisclosed or unrecorded funds, assets or liabilities.*
- *Improper destruction of documents.*

CONSIDER THIS



- Q** - At the end of the last quarter reporting period, my Leader asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.
- A** - No, you did not. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.



Certainty for Our Investors

Cooperating With Investigations and Audits

From time to time, team members may be asked to participate in internal and external investigations and audits that are conducted by our Company or by government officials. All team members are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate and complete.

If you learn of a potential government investigation or inquiry, immediately notify your Leader and the Legal Department before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate and complete.

WATCH OUT FOR



- **Falsified information.** *Never destroy, alter or conceal any document in anticipation of or in response to a request for these documents.*
- **Unlawful influence.** *Never provide or attempt to influence others to provide incomplete, false or misleading statements to a Company or government investigator.*



Certainty for Our Investors

Protecting Company Assets

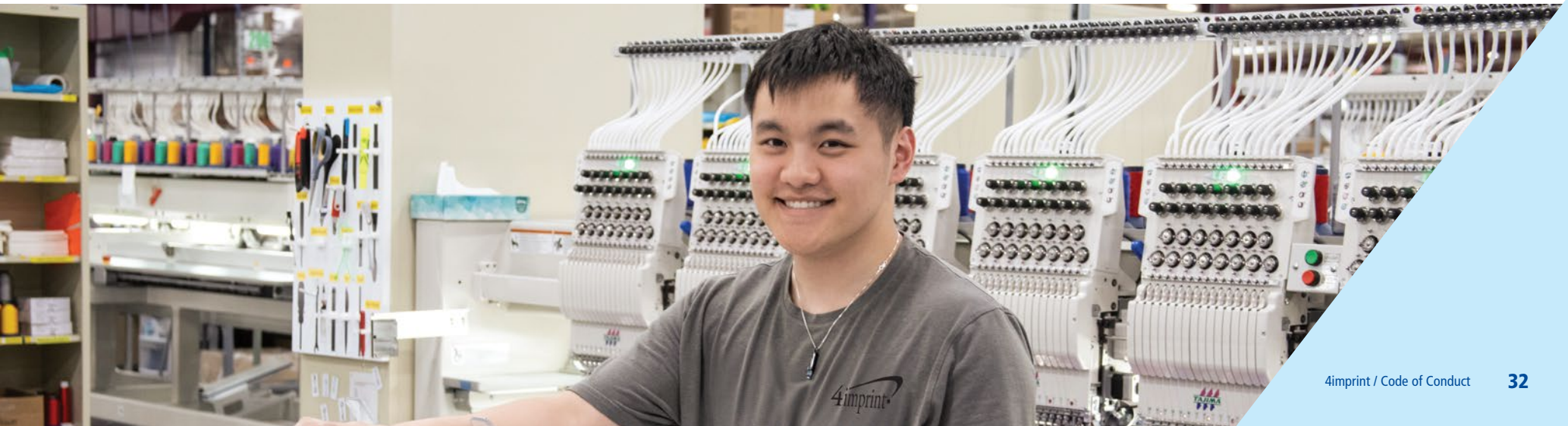
4imprint entrusts team members with assets (both tangible and intangible) that enable us to operate. Physical assets include 4imprint facilities, materials and equipment. Electronic assets include computer and communication systems, software and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security and integrity.

Each of us is personally responsible for using these assets with care and protecting them from fraud, waste and abuse. Your personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment. Be aware that any information you create, share or download onto Company systems belongs to 4imprint, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

Remote Working

Although more team members are working remotely than ever before, our responsibilities to 4imprint remain the same. No matter where we are working — at home, in a hotel room or anywhere else in the world — we have a duty to maintain our Company's high standards and follow our policies.

If you work remotely, always do what is expected of you. Follow the same practices and put in the same number of hours and level of effort you would in an office setting. Also protect any 4imprint assets that are in your care, including technology, hardware and information. Be available to your colleagues during regular work hours and do what is right and required, even without direct supervision.



Certainty for Our Investors

Protecting Company Assets

DO THE RIGHT THING



- Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- Be a good steward of our electronic resources and systems and practice good cybersecurity:
 - Do not share passwords or allow other people, including friends and family, to use 4imprint assets.
 - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment to conduct Company business is prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.
 - Lock your workstation when you step away, and log off our systems when you complete your work for the day.
 - Beware of phishing attempts — use caution in opening email attachments from unknown senders or clicking on suspicious links.

WATCH OUT FOR



- Requests to borrow or use 4imprint equipment without approval.
- Excessive use of 4imprint resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.

WANT TO KNOW MORE?



→ See our [IT Policies](#) for additional information.



Certainty for Our Investors

Avoiding Insider Trading

We respect every company's right to protect its material, nonpublic ("inside") information, and we comply with insider trading laws.

In the course of business, you may learn confidential information about 4imprint or about other publicly traded companies that is not available to the public. Trading securities while aware of inside information, or disclosing it to others who then trade ("tipping"), is prohibited by various laws and our policies.

Inside Information

Material, nonpublic information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- *A proposed acquisition or sale of a business*
- *A significant expansion or cutback of operations*
- *A significant product development or important information about a product*
- *Extraordinary management or business developments*
- *Changes in strategic direction, such as entering new markets*
- *Financial results that have not been publicly disclosed*

DO THE RIGHT THING



- *Do not buy or sell securities of any company when you have material, nonpublic information about that company.*
- *Protect material, nonpublic information from the general public, including information in both electronic form and in paper copy.*
- *Discuss any questions or concerns about insider trading with the Legal Department, Chief Financial Officer or Company Secretary.*

WATCH OUT FOR



- *Requests from friends or family for information about companies we do business with or have confidential information about. Even casual conversations could be viewed as illegal "tipping" of inside information.*
- *Sharing material, nonpublic information with anyone, either on purpose or by accident, unless it is essential for 4imprint-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law, regardless of whether you benefit from the outcome of their trading.*

WANT TO KNOW MORE?



→ **See [4imprint Group's Dealing Policy](#) for additional information.**

Certainty for Our Investors

Gathering Business Intelligence

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, we — and those who work on our behalf — must always live up to the highest ethical standards.

Obtain competitive information only through legal and ethical means, never through fraud, misrepresentation, deception or the use of technology to “spy” on others. Remember: Sharing competitively sensitive information with competitors (whether that information belongs to us or our business partners) is always prohibited.

WATCH OUT FOR



- *Retaining papers or computer records from prior employers in violation of laws or contracts.*
- *Using anyone else's confidential information without appropriate approvals.*
- *Using job interviews as a way to collect confidential information about competitors or others.*
- *Receiving suggestions from third parties for new products, product features or services when the source of the original idea is not fully known.*

DO THE RIGHT THING



- *Be careful when accepting information from third parties. You should know and trust their sources and be sure that the information they provide is not protected by trade secret laws or nondisclosure or confidentiality agreements.*
- *Respect the obligations of others to keep competitive information confidential.*
- *While 4imprint may employ former employees of competitors, recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.*



Certainty for Our Investors

Using Artificial Intelligence Ethically

We embrace new technologies, including artificial intelligence (AI), which is rapidly changing the way 4imprint collects, uses and analyzes data. AI is also empowering us to give customers more efficient and personalized experiences.

Because AI learns and operates in a human-like way, issues involving discrimination, equity and privacy can arise. That is why it is critical for us to use, design and develop these tools ethically from the start. Falling short in this effort can expose us to regulatory, legal and reputational risks. If your work involves AI, data analytics or other digital technologies, be sure to follow all applicable laws and regulations and build new technologies ethically, fairly and transparently.



Certainty for Our Communities and Our Planet

Upholding Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking and forced labor.

DO THE RIGHT THING



- *Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.*
- *Remember that respect for human dignity begins with our daily interactions with one another, our business partners and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.*



CONSIDER THIS



- Q** - When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I did not get a clear answer. What are my next steps?
- A** - You did the right thing — first, to be on the lookout for human rights abuses and, second, to raise the issue with our supplier. The next step is to report the incident to the Chief Product, Supply Chain and Sustainability Officer. We are committed to human rights and to the elimination of human rights abuses, including child labor.

WANT TO KNOW MORE?



- **Our Company is a proud member of the Fair Labor Association and rigorously adheres to its stated principles. See the [Fair Labor Association's Fair Labor Code](#) for additional information.**

Certainty for Our Communities and Our Planet

Participating in Charitable Activities

Corporate social responsibility is an integral part of 4imprint's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

4imprint also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you are participating on your own time and at your own expense.

WATCH OUT FOR



- *Putting pressure on colleagues to participate in personal charitable or volunteer activities.*
- *Using 4imprint funds, assets or the 4imprint name to further your personal volunteer activities, unless you receive approval in advance.*

WANT TO KNOW MORE?



→ Check out our [one by one charitable giving program](#) for additional information.



Certainty for Our Communities and Our Planet

Engaging in Political Activities

Everyone has the right to voluntarily participate in the political process, including making personal political contributions. However, as employees, we must always make it clear that our personal views and actions are not those of 4imprint.

Make it clear that your political views and activities are your own. You do not represent 4imprint.



DO THE RIGHT THING



- *Ensure that your personal political views and activities are not viewed as those of the Company.*
- *Do not use our resources or facilities to support your personal political activities.*
- *Follow all federal, state, local and foreign election laws, rules and regulations as they relate to Company contributions or expenditures.*

WATCH OUT FOR



- **Pressure.** *Never apply direct or indirect pressure on another team member to contribute to, support or oppose any political candidate or party.*
- **Improper influence.** *Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.*
- **Conflicts of interest.** *Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at 4imprint.*

Certainty for Our Communities and Our Planet

Protecting Our Planet

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of team members, customers and the public.

Protect team member safety and the environment. Read and understand all the information provided by our Company that is relevant to your job and operate in full compliance with environmental, health and safety laws and regulations.

DO THE RIGHT THING



- *Fully cooperate with environmental, health and safety training, and with our Company's periodic compliance reviews of our products and operations.*
- *Stop work and report any situation that you believe could result in an unsafe working condition or damage to the work environment.*
- *Provide complete and accurate information in response to environmental, health and safety laws, regulations and permits.*
- *Be proactive and look for ways we can minimize waste, energy and use of natural resources.*



Helpful Information

To submit an inquiry or concern anonymously, use the Speak Up Connection at SpeakUp.4imprint.com.

Any waiver of the Code for executive officers or directors may be approved only by the Board of Directors or a Board committee and will be promptly disclosed to shareholders as required. Any waiver of the Code for any other employee may be made only by the Legal Department.

4imprint supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right.

Our Code and the policies it references may be modified from time to time without prior notice. For the most current version, visit our [policy site](#), or please contact Human Resources or the Legal Department.

