



Quad/Graphics, Inc. Supplier Code of Conduct

Purpose and Scope

Quad/Graphics, Inc. ("Quad") believes that adhering to the highest possible standards of integrity and ethical behavior is not only the right thing to do, but also the right thing to do for our business. Quad has developed this Supplier Code of Conduct ("Supplier Code") to clarify our requirements in the areas of business integrity, labor practices, associate health and safety, and environmental management. Quad's Supplier Code is intended to complement Quad's Code of Business Conduct for employees.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Quad entities (collectively hereafter referred to as "Supplier" or "Suppliers") are required to follow the Supplier Code.

Business Conduct Principles

Quad expects its Suppliers to conduct business responsibly, with integrity, honesty, confidentially and transparency by adhering to the following principles:

1. Maintain awareness and comply with all applicable laws and regulations of the countries of their operation.

2. Compete fairly for Quad's business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Quad is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, Suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Suppliers agree to act in accordance with the United States Foreign Corrupt Practices Act and any foreign equivalent or other anti-corruption laws.

3. Protect confidentiality.

Suppliers with access to confidential information must not disclose such information to any other company or person without advanced written consent from Quad Corporate Procurement.

Confidential information includes, but is not limited to:

- Product specifications,
- Product content,
- Account information, and
- Quad's brand (logo, name and tag line) in supplier advertisements or references, this includes written, electronic, visual or verbal communication.

Supplier procedures must be in place to ensure that confidential information is protected against unauthorized disclosure and theft. Quad Corporate Procurement must be notified at (414) 566-6000 by the Supplier if they become aware of an actual or possible unauthorized disclosure of Quad information.

4. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.

Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.

5. Treat employees fairly, including with respect to wages, working hours and benefits.



Suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages, benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.

6. Prohibit all forms of forced or compulsory labor.

Suppliers shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and there may be no coerced or forced labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

7. Prohibit use of child labor.

Suppliers shall adhere to the minimum employment age limit defined by national law or regulation, and comply with relevant International Labor Organization (ILO) standards. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.

8. Respect employees' right to freedom of association and collective bargaining, consistent with local laws.

Consistent with applicable law, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.

9. Provide safe and healthy working conditions.

Suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, Suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

10. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

Suppliers will comply with all applicable environmental laws and regulations and must abide by the three principles on the environment that are set out in the United Nations Global Compact:

1. Support a precautionary approach to environmental change,
2. Undertake initiatives to promote greater environmental responsibility, and
3. Encourage the development and diffusion of environmentally friendly technologies.

To comply with these principles, Suppliers are to ensure that the resources and materials (including precious metals) they use are:

- Sustainable;
- Capable of being recycled;
- Used effectively with a minimum of waste unless Quad specifically requests a Supplier to use a specific product or material; and
- Processes are planned, monitored and conducted in such a way to ensure environmental impacts are minimized.

11. Maintain and retain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Supplier reports, records and filings made in the course of business must be accurate and truthful. No one may falsify or improperly alter any information contained in the Supplier's records. Ethical accounting principles must be followed. For example:

- All funds, assets, transactions and payments must be accurately reflected;



- Payments for goods and services provided to Quad must be payable to the company legally entitled to receive payment;
- All invoices must accurately reflect the items and services being purchased or sold and the prices being paid; and
- Discounts must be included in the price or otherwise stated on our invoices.

Documents and records must also be retained for the appropriate period of time as required by company policy or by the law.

12. Deliver products and services meeting applicable quality and safety standards.

Quad is committed to producing high quality and safe products across all of our brands. Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at your location;
- Follow and adhere to good manufacturing practices and testing protocols;
- Report issues immediately to Quad that could negatively affect the quality or public perception of a Quad product; and
- Provide material safety data sheet (MSDS) upon request.

13. Respect animal welfare.

Suppliers must ensure that they do not conduct, or cause third parties to conduct, any animal testing on products, raw materials or components of finished products supplied to Quad, unless such testing is necessary to meet the requirements of applicable laws or regulations.

14. Observe Quad's policies regarding gifts and entertainment and conflicts of interest when dealing with Quad employees.

Suppliers doing business or seeking to do business with Quad are prohibited from providing significant gifts, entertainment, favors, gratuities, and cash or cash equivalents to employees. Such gifts could influence an employee's ability to make appropriate judgments in the interests of the business.

15. Adhere to Quad's supplier Corporate Procurement protocol.

Supplier inquiries should be directed to Corporate Procurement at (414) 566-6000. Supplier site visits must be for valid business purposes and Suppliers must perform the following prior to visiting Quad locations:

- Obtain approval from Corporate Procurement or Department Manager/Supervisor prior to visit,
- Have acknowledged understanding and receipt of Quad's safety manual, and
- Have completed Quad's onsite safety orientation.

16. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Quad.

To conduct business with Quad, Suppliers must enter into contracts and execute purchase orders that mandate compliance with the Supplier Code. With prior notice, Quad may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

17. Report suspected violations of the Supplier Code.

Suppliers may report suspected violations of the Supplier Code to the Quad ethics and compliance hotline at:

- U.S. and Canada 1-877-895-5411
- Brazil 0800-892-1579
- Mexico 001-877-556-8022



- Colombia 01-800-912-0135
- Perú 0800-70-005 and 0800-52-950
- Poland 0-0-800-111-1564
- Argentina 0800-266-4534

The ethics and compliance hotline is available worldwide on a 24/7 basis. Reports may also be made electronically by using web-based reporting:

- Global (excluding Europe): <https://gg.alertline.com>
- Europe: <https://ggeu.alertline.com>

All such reports are treated as confidential, whether provided through our telephone line or web-based reporting, and you may remain anonymous where permitted by law.

Suppliers are expected to take appropriate steps to ensure that the principles of this Supplier Code are communicated to their employees and throughout their own supply chains. Suppliers are also expected to take appropriate steps to ensure that the principles of this Supplier Code are adopted and applied by their employees, suppliers, agents and contractors to the extent applicable.