



Workplace Code of Conduct

- I. **Introduction.** Jostens, Inc.'s Workplace Code of Conduct (the "Code") describes the way Jostens, Inc. and all its subsidiaries (collectively, "Jostens") believes its business should be conducted. Jostens selects business partners who share its commitment to ethical standards, the promotion of sustainability principles and who comply with the principles of its Code. Jostens and Jostens' business associates' manufacturing facilities ("Facilities") must, at a minimum, adhere to all applicable laws. Jostens adheres to the following professional standards, which affirm its commitment to principles and practices that are ethical and lawful, as well as good business. Where differences or conflicts in standards required by this Code arise, the highest standard shall apply.
- II. **Ethical Principles.** We acknowledge our corporate responsibilities to all of our stakeholders, including our customers, employees, representatives and the communities in which we do business. In order to effectively conduct business and represent the interests of our stakeholders, we strive to conduct our business in an ethical and responsible manner.
- III. **Environmental Compliance.** We expect Facilities to act responsibly with respect to the protection and preservation of the environment. Facilities are dedicated to promoting responsible sustainability, which includes limiting pollutants, seeking less hazardous alternatives, recycling, conserving resources and promoting environmental awareness among workers and suppliers.
- IV. **Workplace Standards.** These Workplace Standards apply to all facilities that produce goods for Jostens. For the avoidance of doubt, these standards also apply to all employees of Jostens. While Jostens recognizes that there are different legal and cultural environments in which Facilities operate throughout the world, these Workplace Standards, together with compliance with applicable local law, set forth the basic minimum requirements all Facilities must meet in order to do business with Jostens.
 - A. **Laws and Regulations.** Facilities shall, at a minimum, comply with all national and international laws and regulations applicable to the jurisdictions in which they operate, including labor and social security laws and regulations.
 - B. **Child Labor.** Facilities shall not employ workers younger than 15 years of age, under the age for completing compulsory education in the country of manufacture, or younger than the minimum age established by law in the country of operation, whichever is higher.
 - C. **Involuntary Labor.** Facilities shall not use any form of involuntary labor, including forced labor, prison labor, bonded labor, indentured labor or other forms of forced labor.
 - D. **Harassment or Abuse.** Facilities shall provide a work environment free of harassment. Facilities must treat all employees with respect and dignity. Facilities shall not subject employees to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.
 - E. **Wages and Benefits.** Facilities shall provide wages and benefits that are sufficient to meet workers' basic needs and provide for some discretionary income. At a minimum, Facilities shall provide wages and benefits that comply with all applicable laws and regulations and contracts, as applicable, and that match or exceed the prevailing industry wage. Where compensation does not meet workers' basic needs and provide for some discretionary income, each Facility shall work with the Fair Labor Association to take appropriate actions that seek to progressively realize a level of compensation that does. Facilities shall compensate for overtime hours at a premium rate, which premium rate shall be no less than one-and-a-quarter times the regular rate, or at such a rate as is required by applicable rules and regulations (or required by contract), whichever rate is highest.



- F. Working Hours.** Facilities shall ensure that workers' hours shall not exceed the sum of the regular and overtime hours allowed by the law of the country of manufacture. The regular work week shall not exceed 48 hours per week. Facilities shall provide balanced, scheduled overtime where possible, shall limit regular and overtime hours in a week to 60 hours and shall provide employees at least 24 consecutive hours of rest in every seven-day period, except in exceptional business circumstances, which shall refer to circumstances that are out of the ordinary and out of the control of the Facility. All overtime shall be consensual, and Facilities shall not request overtime on a regular basis.
- G. Health and Safety.** Facilities shall provide a safe and healthy work environment and must at a minimum comply with all applicable laws and regulations regarding the provision of a safe and healthy working environment, including in an effort to prevent accidents and injury to health in course of work or as a result of the operation of the Facility and shall use best efforts to comply with all health and safety standards established by the International Labor Organization. Facilities will have adequate fire protection, emergency exits that are accessible at all times, clean air, clean water, adequate rest periods, unrestricted use of toilets and the right to leave work without penalty to receive medical care. Workers will not be exposed to hazardous activities or materials that may endanger their health and safety. The foregoing requirements shall also apply to dormitory facilities, if applicable. Facilities shall also comply with all applicable environmental laws and regulations and shall strive to implement reasonable measures to mitigate negative impacts on the environment and to promote environmental sustainability. Facilities shall protect residential areas located adjacent to, or near, their locations, disposing of garbage and waste in such a way so as not to endanger the safety and health of nearby areas.
- H. Nondiscrimination.** Facilities must be dedicated to providing a working environment free of discrimination. No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, or termination or retirement, on the basis of gender, race, religion, age (except with respect to child labor set forth herein), disability, sexual orientation, pregnancy, gender identity, marital status, nationality, political opinion or affiliation, union involvement, social group or ethnic origin. Facilities shall employ individuals solely on the basis of their ability to perform the job.
- Nothing in the above should be construed as preventing Facilities from retaining and/or rewarding workers on the basis of seniority, nor in pursuing equal opportunity employment practices.
- I. Freedom of Association and Collective Bargaining.** Facilities shall recognize and respect the right of employees to freedom of association and collective bargaining with bargaining representatives of their own choice. No worker shall be subject to harassment, intimidation or retaliation as a result of his or her efforts to freely associate or bargain collectively.
- J. Women's Rights; Parental Rights.** Facilities shall ensure female workers receive equal treatment in all aspects of their employment. Pregnancy tests will not be a condition of employment and pregnancy testing, to the extent provided by Facilities, will be at the option of the worker. Employees will not be exposed to hazards that may endanger their reproductive health, and employees will not be forced to use contraception. Facilities shall reinstate workers who have taken maternity leave at the same rate of pay and benefits. Employees shall be provided appropriate services and accommodations to women workers in connection with pregnancy.
- K. Communication.** Facilities must post this Code in all major workplaces, translated into the language(s) of the workers and supervisors.



- L. Subcontracting.** Facilities will not utilize subcontractors in the manufacturing of Jostens' products or components thereof without Jostens' written approval and only after the subcontractor has agreed to comply with the Code, including these Workplace Standards.
- M. Monitoring and Compliance.** Facilities will maintain on site all documentation necessary to demonstrate compliance with these Workplace Standards. Jostens will undertake affirmative measures, such as announced and unannounced on-site inspections of production facilities, to monitor compliance with these Workplace Standards. Jostens' business associates must allow Jostens' representatives full access to production facilities, employee records and employees for confidential interviews in connection with monitoring visits. In addition, Jostens' business associates must respond promptly to reasonable inquiries by Jostens' representatives concerning the operations of their respective Facilities.

Violation of these Workplace Standards will be appropriately remedied by Jostens' business associates at the cost of the Jostens business associate. Failure to comply with these Workplace Standards and/or address noncompliance through remediation may ultimately result in termination of the Jostens' business partner's contract.

Rev. 05-13-19