

# CODE OF CONDUCT

## ONLINEPRINTERS GROUP



# **WELCOME TO THE ONLINEPRINTERS (OP) GROUP OF COMPANIES**

You are now working for one of Europe's most successful online printing groups and we are glad to have you as part of our team.

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# PREFACE

Dear Colleagues

All companies of the Onlineprinters Group (OP Group) stand for high-quality products and services. Years of customer focus and cooperation based on trust and partnership have earned us an excellent reputation among our customers and partners. Our commitment to act ethically and within the law has proven its worth and remains crucial to our further development.

While it takes lots of time and effort to establish a reputation like this, wrong actions, statements or decisions of employees can immediately bring a company into disrepute.

This prompted us to adopt a Code of Conduct for the OP Group. The Code of Conduct will guide us in our daily work and help us make responsible decisions in critical situations, fully in line with the legal framework conditions and the interests of the company. This Code will also help us recognise misconduct and irregularities, and adequately react to these.

The Code of Conduct is binding for all executives and staff members across all company levels and in all subsidiaries. It is the standard of our daily action. Since all our colleagues also act as representatives of the Group of Companies in public, their correct and responsible behaviour is a matter of course.

This is how each and every one of us can do their bit to make the OP Group even more successful.

*Sascha Krines*  
CEO Onlineprinters Group

# OUR CODE OF CONDUCT

Our Code of Conduct describes the principles by which we expect every single colleague at the OP Group to conduct our business. It sets out the key values, standards and behaviours we require from everyone, in whatever capacity and wherever we work. This code serves as a foundation for the specific policies in place within each member of the OP Group which, where applicable, take local legislation, regulation and procedure into account.

As an Employee of the OP Group, we all are expected to conduct ourselves as follows:

## PRIDE, RESPECT & CUSTOMER CARE

In general, we ...

- maintain satisfactory standards of conduct and performance at work, complying with all reasonable management instructions as well as all applicable laws.
- take all necessary steps to safeguard the Group's public image and preserve positive relationships with our customers, clients, suppliers or members of the public.
- ensure that we behave in a way that does not constitute unlawful discrimination.

### **Work within the best interest of the Group**

The OP Group has an expectation that all of us will carry out our duties with a flexible approach, acting lawfully, honestly, ethically, and in the best interests of the OP Group and our colleagues. We devote the whole of our time to our work during our working hours.

### **Take care and pride in your work**

We all work to the best of our abilities and take pride in the work that we carry out. We expect everyone to be professional at all times, aiming for high standards in our individual performances and when working in collaboration with our colleagues.

## **Treat others with respect and ensure the best possible support to our colleagues**

We always show respect and support to our colleagues. We promote a culture of respect, inclusion, equality and diversity and we have the appropriate policies and practices in place to support this.

## **Ensure the best possible customer care and service**

We always aim to deliver the highest level of customer care and service. The customer is the core of our business and we are devoted to providing the best customer experience. Whether dealing with customers face to face, by telephone, email or through any other communications platform, we are representing both the OP Group and our area within the OP Group. Be polite and professional in any form of communication and at any time. It's simple: Always treat clients and customers as you would want to be treated yourself.

# **EQUALITY, RELATIONSHIPS AND APPEARANCE**

## **Equal opportunities**

The OP Group is an equal opportunities employer and will not tolerate any form of unlawful discrimination. We appreciate all our unique qualities and characteristics and know that it is diversity which makes a company truly valuable. At all times, we aim to:

- Select, recruit, develop and promote the very best people, basing judgement solely on suitability for the job;
- Ensure all applicants and employees receive fair and equal treatment irrespective of sex, marital status, nationality, colour, race, age, national origin, religion, belief, sexual orientation, disability or any other protective characteristic;
- Ensure all colleagues receive fair and equal treatment irrespective of whether they work part-time or are engaged on a fixed term contract;
- Respect diverse opinions and perspectives;
- Maintain a working environment free from harassment and intimidation;
- Ensure that existing and new legislation regarding equal treatment are adhered to;
- Deal speedily and effectively with any complaints of alleged discrimination and/or harassment, ensuring all complaints are fully investigated and that remedial action is taken where necessary.

## **Relationships at work**

We appreciate that work is a place where you meet people and can form close relationships and friendships. This is part of what we like so much about our business culture here at the OP Group. However, please be aware that everyone has to disclose personal and also business relationships that may involve a conflict of interest. This is to ensure that there can be no actual or perceived conflict of interest or ‘favouritism’. In addition, it may not be appropriate for one person to be managing another where there is a close personal relationship. In this event, we may require one person to move departments or job roles or seek an alternative resolution.

Please remember: A conflict of interest is not usually a violation of the Code – but not disclosing is.

## **Personal presentation**

Everyone at the OP Group is expected to follow the appropriate dress code.

## **Our public appearance**

We strive for a public image of the OP Group that is consistent with our ethics and values. In order to do so, every one of us conveys our culture of helping each other, respect, equality and customer-orientation in our interactions with the public.

## **Our use of social media**

Social Networking is in common use for both individuals and organisations. It is important to recognise that information posted on a social networking site, or comments made over social networking sites or ‘blogs’ can have a direct impact on the OP Group.

Therefore, to clarify, we:

- Never make any comments on any websites, blogs or social media sites which may bring any member of the OP Group into disrepute or damage working relationships between us and colleagues and/or clients or other third parties. In addition, we do not make comments that are offensive, discriminatory or derogatory (about the OP Group, a company within the Group or any third party);
- Do not post or discuss confidential information on any sites;
- Do not post any information relating to the OP Group’s affairs (this may include operational matters, restructures, changes in personnel etc.);
- Do not share contact details, images or personal information of colleagues or customers;

- Never use statements, photos, videos, audio or send messages/links that reasonably could be viewed as malicious, abusive, offensive, obscene, threatening, intimidating or contain nudity or images of a sexual nature, or that could be seen as bullying, harassment or discrimination;
- Abstain from personally sharing/posting any photographs, videos or other images of staff whatsoever.

## **HEALTH, SAFETY AND SUSTAINABILITY**

### **Alcohol, illegal drugs or substances**

Alcohol, illegal drugs and other substances (e.g. solvents) may affect our judgement, performance and the health and safety of not only us but also our colleagues. Therefore, we must never be under the influence of alcohol, illegal drugs or any other substance during working hours.

### **Maintain a safe and healthy environment for everyone to work in and be proactive in managing our responsibilities to the environment**

To keep everyone safe at work, we are required to gain an understanding of our health and safety policies and procedures and observe them. If you are required to wear Personal Protective Equipment for the performance of your duties, you must do so.

### **Personal hygiene**

Take all reasonable steps to maintain acceptable levels of personal hygiene. You must ensure you adhere to all laws, hygiene instructions and policies. For up-to-date information please refer to your Human Resources Department.

### **Promote our environmental policies and practices**

Colleagues undertake to comply with all environmental, pollution prevention and environmental protection regulations applicable to the OP Group's activities, as well as all instructions or guidelines for the handling of materials, recycling and pollution prevention.

### **Think and act sustainably**

We respect the environment – not only in our printing services. In our daily work, we always pay attention to acting in the most sustainable way possible, representing OP Group's ethical values. This can be reflected in a responsible use of paper at the office, in saving energy by turning off electric devices and lights, in helping our customers consider the ecological aspects of their purchases, in our chosen

mode of transport to the office or in preventing waste wherever possible. And of course, we view sustainability not only in environmental terms but also in social and economic ones. We are aware of our impacts on the society and actively work on being efficient and effective in order to be economically successful.

The OP Group will evolve sustainably with your help – please submit any improvement suggestions your Human Resources Department.

### **Use of the OP Group's resources provided to colleagues**

We take care with due diligence of all items or goods provided by the OP Group, as we would with our own property, and in a manner appropriate to our work. These items include laptops, mobile phones, tablets and company vehicles, tools, materials and among others. We are obliged to use IT resources diligently and responsibly to carry out our activities.

## **CONFIDENTIALITY OF OP GROUP'S DATA AND INFORMATION**

### **Follow Data Protection legislation and related policies**

In the course of our work life together, we are likely to collect, process or store personal information about colleagues, clients, customers and suppliers. These could be for example their names, telephone numbers and email addresses.

Data protection law contains strict principles and legal requirements that must be adhered to before and during any processing of any personal information. Be aware that everyone has a responsibility to comply with the General Data Protection Regulations and failure to meet those responsibilities are likely to lead to serious consequences. If you have any questions about data protection at the OP Group, please contact your local data protection officer.

### **Media enquiries**

Any queries received from the media must be referred immediately to management. Do not attempt to deal with queries yourself.

### **Respect the confidentiality of personal and OP Group information**

Most of the information we handle in our daily work life is to be used only internally. So, when it comes to internal information about the OP Group, we protect it responsibly and do not share it with outside parties. In fact, we shall not at any time during (except in the proper course of carrying out our duties) or after our

employment whether directly or indirectly disclose to a third party or make use of any confidential information.

“Confidential Information” shall include: information (whether or not recorded in documentary form, or stored on any magnetic or optical disk or drive) which is not in the public domain relating to the OP Group’s customers and prospective customers; business methods; products; corporate plans; finances; business opportunities and development projects of the OP Group; databases; trade secrets including technical data, designs or inventions belonging to the OP Group; all or any information relating to the marketing or sales of any past, present or projected product or service of the OP Group; and any information in respect of which the OP Group owes an obligation of confidentiality to a third party.

We are not permitted to mention or refer to the OP Group’s working practices and business-related methods on any Social Media platform. All internal policies, procedures and machinery throughout the OP Group are considered confidential and should not be discussed with anyone other than existing and current employees.

We are not permitted (except in the proper course of carrying out our duties) to take photographs, videos or recordings of any type of company property, premises or any work taking place inside or outside the office at any point without prior written and signed permission from the responsible line manager and the concerned.

In case you are not sure if an information is confidential, treat it as if it is. For detailed answers about the correct treatment and disclosure of group information, please contact your local management, who will gladly assist you with your questions.

## **LAWFULNESS AND WHISTLEBLOWING**

### **Clear and correct reporting**

We all have and follow the responsibility to present any information that is requested clearly and correctly, for example business reports, accounting figures, audit reports, etc.

### **Avoid conflicts of interest, always acting in the best interest of the OP Group**

Act with loyalty and in the defence of the interests of the OP Group, avoiding situations that may give rise to a conflict between our personal interests and

those of the OP Group. We are not permitted, in the exercise of our positions or responsibilities, to act in any way that may lead to present or future benefits for ourselves or related persons.

### **Comply with all applicable laws and regulations**

We are fully committed to the laws and regulations in each country in which we operate. As a colleague you are expected to follow such laws, regulations and Company policies to ensure we remain compliant in this area.

- We do not use child labour in our company and have no employees under the age of 15. We comply with applicable legislation.
- Employees are free to choose their trade union affiliation. In Denmark, Sweden, and Germany, we have entered into collective agreements with the relevant unions in accordance with the agreements made between our employers' organization and the unions. In other countries where such agreements are not in place, we respect local labour laws and ensure that employee rights to union membership and representation are upheld.

### **Reject bribery and corruption and avoid being compromised by gifts and entertainment**

We do not tolerate any form of bribery or corruption and seek to act with honesty and integrity in all our business dealings. We will immediately and thoroughly investigate any allegation of bribery or corruption and will take any necessary appropriate action.

If you become aware of bribery or corruption occurring, report this to your manager or a director without delay. As a preventative measure we have set out the following guidelines:

- Any expenditure relating to gifts, gratuities or entertainment must be authorised in advance by a director. Especially when receiving gifts/gratuities/invitations from or giving them to government officials, special care needs to be taken. If you have any doubts, please don't hesitate to contact the Human Resources Department.
- We make sure that nobody at the OP Group is involved in activities that involve price agreements or any other actions against antitrust or competition laws.
- All gifts over a value of 25 GBP (25 EUR) must be declared to the local Chief Compliance Officer. This also applies to multiple gifts that collectively exceed this value. We must not receive any gifts or gratuities at our home addresses.

- Gifts and gratuities include physical gifts; entertainment; corporate hospitality; vouchers; free or discounted goods or services; free or discounted use of facilities, property or any other items from suppliers, clients or other third parties.
- Everything we print – especially vouchers – is not to be used by employees (e.g. 100 GBP voucher for a furniture company).

### **Report any concerns of misconduct, malpractice, illegal or unethical behaviour**

We aim to uphold the highest standards in all areas of our business. This includes the conduct of every individual and business practice.

To uphold these standards, we ask and expect everyone to report any suspected acts of misconduct, dishonesty or breach of Group/Company rules or procedures you either become aware of or that may be contemplated or discussed by any colleague, worker or third party. You should also report any situations that may be considered to be unethical, in breach of our values or that may constitute a breach of any regulations.

We would also ask you to report any matters that you consider may be detrimental to the OP Group. This may include behaviour that seeks to deliberately undermine management or any act or behaviour that is in bad faith.

If you have concerns about serious malpractice, this may be reported under our **whistleblowing procedure** which enables colleagues to raise concerns about actual or possible serious malpractice at an early stage and to provide assurance to employees that any matters raised will be dealt with seriously, without fear of reprisal and confidentially. Please refer to your Whistleblower Policy Brochure for detailed information on what and how to report.

### **In the case of misconduct**

Any breach of this code or misconduct in breach of our business practices or policies will be investigated and where necessary addressed in accordance with our disciplinary procedures.

Full details of the above code and further policies relating to your employment are available from your manager or your Human Resources Department.

We reserve the right to change or amend our standards or this code as may be required to facilitate the continued efficiency of the business and the wellbeing of employees. Any introduction or changes to standards will be advised to you.

# THE OP GROUP'S WHISTLEBLOWER POLICY

## 1. Purpose

These rules of conduct define how to proceed in the event of an incoming report of violations of applicable law at the OP Group, as well as the options for submitting this report.

## 2. Violations of rules

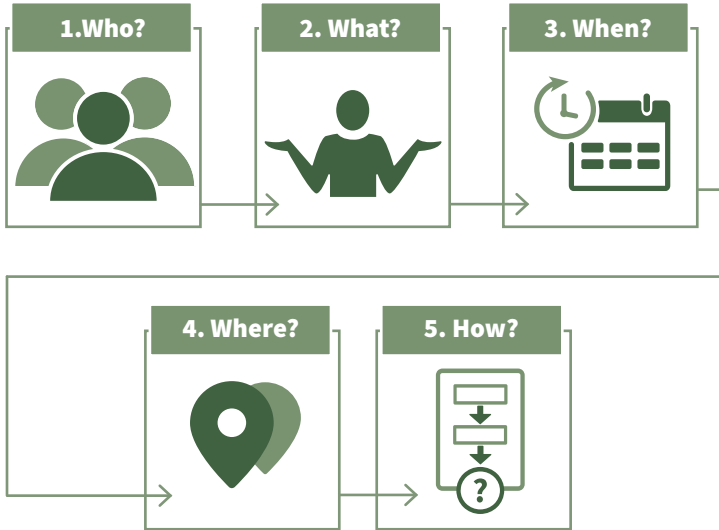
There is no precise list of which breaches of the rules are covered by the new EU Whistleblower Directive. In Article 5 of the EU Whistleblower Directive, the individual definitions are roughly outlined, but not defined more precisely. The following list gives some examples of cases that require a report to the whistleblower system.

- Corruption, antitrust and money laundering offences
- Bribery offences (see Bribery and Corruption Policy)
- Theft, embezzlement and enrichment offences
- Serious violations of physical and mental integrity
- Cases of sexual harassment, discrimination, racism
- Violations of data protection relevant under criminal law
- Accounting and bookkeeping violations with a significant impact that are externally identifiable
- Serious violations related to technical specifications and/or technical security
- Violation of human rights (e.g. violation of the principles of the UN Global Compact)
- Violations related to environmental regulations and/or non-compliance with product-related environmental regulations
- Export control violations, violation of sanctions
- Serious violations of the integrity of the whistleblowing system, e.g. serious breach of whistleblower anonymity, serious breach of reporting obligations
- Other high risks, e.g. breaches of rules with damages exceeding approx. 100.000 GBP (100.000 EUR /DKK 745,00/SEK 1,115,000) for the company
- Breaches of rules likely to damage the reputation of the company

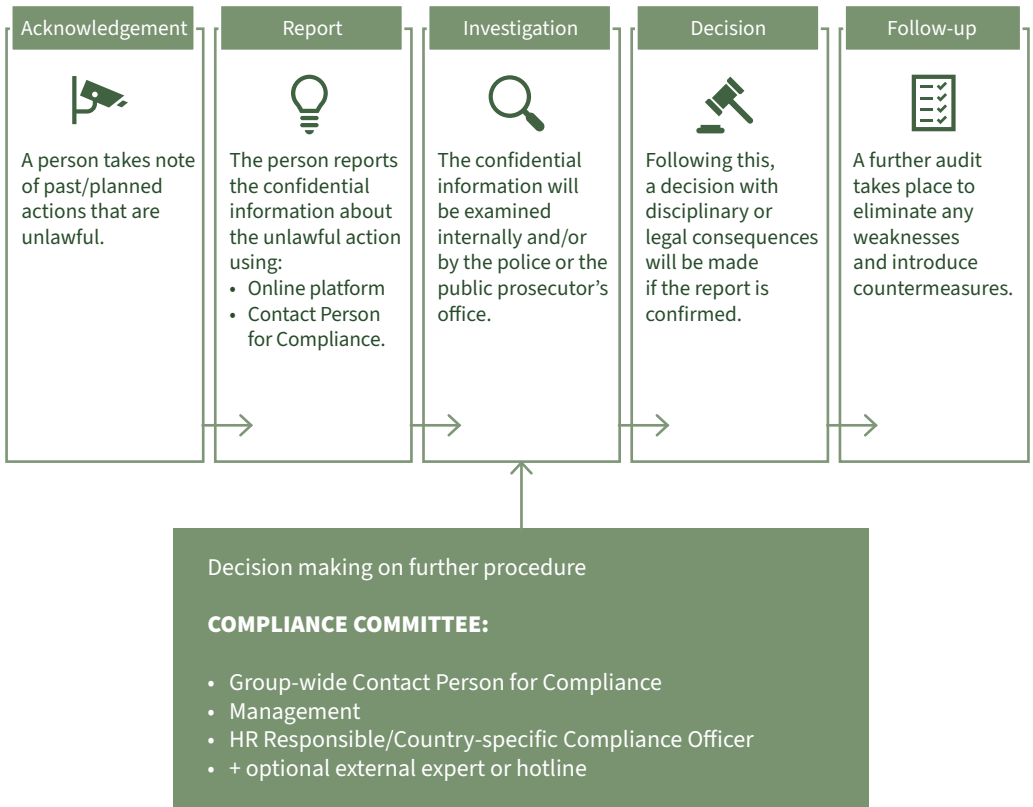
For the correct processing of one of the above-mentioned points, it is important that the report is made and documented in such a way that it can be

understood by a third party outside the subject area. Therefore, you should ask yourself whether you, as a third person, would understand this incident.

The following five questions can be used for this purpose:



### 3. Reporting path (process steps of a whistleblower)



**Step 1:** The whistleblower becomes aware of a violation of rules in the company.

**Step 2:** A report is made via the online platform Otris Compliance:

**[www.report-securely.eu/onlineprinters](http://www.report-securely.eu/onlineprinters)**

Complete anonymity of the whistleblower while maintaining a feedback loop is possible.



**Step 3:** Within seven days after submitting the report, the whistleblower receives an acknowledgement of receipt. The information received is viewed and evaluated internally by the country-specific Contact Person. Depending on the size and severity of the violation, it is assessed by the Compliance Committee, which then initiates appropriate steps or involves the police and/or the public prosecutor's office. Within three months after the report, the responsible Contact Person has to report back to the whistleblower about the treatment of their report and potential actions taken.

**Step 4:** After a thorough examination of the case, a decision is made by the Compliance Committee and, if necessary, disciplinary or legal measures are initiated.

**Step 5:** Verification that the measures worked and that the incident in question cannot occur again.

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