

SUPPLIER CODE OF CONDUCT

ONLINEPRINTERS GROUP



1. PREAMBLE

The Onlineprinters Group, hereinafter referred to as the OP Group, is one of Europe's largest online print shops. We believe that respecting human rights and the environment is the fundamental pillar of responsible corporate governance. It is our economic and ethical mission to embrace the respect for human rights and the protection of the environment within the framework of our activities and our value chain. We use our technologies, ideas and innovations to work towards making the best possible contribution to a future worth living with a better quality of life for all of us.

Thus, acting responsibly and ethically towards employees, business partners, society, and the environment constitutes an integral part of the OP Group's set of values. Complying with law and order is a matter of course in our business endeavours. Our Code of Conduct defines the boundaries within which we, as employees of the OP Group, must act in order to comply with laws and internal guidelines.

To ensure that the companies in our supply chain also live up to our standards, the OP Group lays down mandatory minimum requirements for our business partners in this Supplier Code of Conduct. After all, the continuity and further development of successful business relationships depend substantially on a mutual commitment to integrity and responsible entrepreneurship.

In particular, we expect you, as a supplier ("you"), to acknowledge, support and observe the following ESG standards. These are based on the:

1. ten principles of the United Nations Global Compact Initiative,
2. the United Nations Guiding Principles on Business and Human Rights,
3. the ten core labour standards of the ILO.

The following provisions are mandatory for the cooperation between the companies of the OP Group and their suppliers. The Supplier Code of Conduct applies as long as the supplier is in a business relationship with one or more companies of the OP Group.

We would like to thank all business partners who join us in advocating responsible and ethical behaviour in the economy.

Sascha Krines
CEO Onlineprinters Group

2. FUNDAMENTAL VALUES AND PRINCIPLES

2.1 ETHICS AND INTEGRITY

2.1.1 COMPLIANCE WITH APPLICABLE LAW

The OP Group imposes high demands in terms of compliance with laws, rules and regulations. As a supplier to the OP Group, you commit to complying with all applicable laws and international standards relevant to your activities. This includes protecting the environment, workers and human rights. Moreover, you are also responsible for your products, services and business practices meeting applicable safety, health and environmental standards. You must have all necessary permits, licences and certifications required for your operations and ensure that all companies in your supply chain also meet the legal requirements.

If national laws deviate from international human rights standards, you shall make sure that you observe the national laws as a minimum standard.

2.1.2 DATA PROTECTION AND INFORMATION SECURITY

Trade secrets and confidential information are treated with the utmost care, and appropriate measures are taken to ensure their protection and security.

We expect you, as a supplier, to comply with all applicable data protection laws and regulations, in particular, the provisions of the EU General Data Protection Regulation (GDPR), the Data Protection Act 2018 (UK) and other national data protection laws.

You must make sure that you keep personal data confidential and implement appropriate security measures to prevent unauthorised access, loss or misuse. Access to personal data should be limited to authorised persons who need this information to perform their jobs. In the event of a breach of data protection or a security incident, we expect you to notify us immediately and cooperate with us to take appropriate steps to protect the data concerned.

Confidentiality and protection of information are crucial components of our supplier relationship. You must make sure that confidential information which you obtain in the context of our relationship is appropriately protected and not shared with third parties to ensure protection from internal and external misuse and threats.

As our business partner, you undertake to use information provided by the OP Group only to comply with the existing agreements and not for your own or personal purposes that are inappropriate or inadmissible, or for unethical or illegal activities.

2.1.3 BUSINESS ETHICS AND ANTI-CORRUPTION PRACTICES

The OP Group attaches greatest importance to ethical behaviour and integrity in all business matters. As a supplier, we expect you to join us in advocating these values and to act ethically and with integrity. We do not tolerate corruption, bribery, extortion or other unethical practices such as personal gain. You must ensure that your employees are not involved in such activities and that your company is characterised by an environment of integrity and ethical behaviour. Moreover, we are adamantly opposed to any form of money laundering and request that you take measures to prevent financial transactions from being used by others for money laundering or terrorist financing.

2.1.4 FAIR COMPETITION

You are committed to fair, performance-based competition and do not engage in anticompetitive agreements with other market participants. This means, in particular, that you do not participate in cartels or other restrictive or unfair practices.

Suppliers should respect the principles of fair competition and act in the best interest of both parties.

2.1.5 GENERAL PRODUCT SAFETY REGULATIONS

The supplier guarantees that all delivered products comply with the requirements of the EU General Product Safety Regulation and do not pose any risks to health, safety, or the environment. The supplier ensures that the products are correctly labeled, traceable, and accompanied by the necessary conformity documentation. In the event of violations, the supplier bears responsibility and commits to immediate rectification as well as cooperation with authorities and the OP Group.

2.1.6 CONFLICTS OF INTEREST

As a supplier, you undertake to avoid business practices that could present a conflict of interest or the appearance of impropriety. You must ensure that you

make all business decisions fairly, transparently and pursuant to the best ethical standards and comply with the standards of proper business conduct.

The OP Group expects you to disclose any conflicts of interest and to report any breaches of this Supplier Code of Conduct promptly.

2.2 HUMAN RIGHTS

2.2.1 FAIR WORKING CONDITIONS

The OP Group attaches great importance to fair and appropriate working conditions for all employees, regardless of whether they work for the OP Group directly or indirectly. As a supplier, you undertake to share these values and ensure that you treat your employees fairly. This includes guaranteeing appropriate remuneration that aligns with industry standards and considers the regional cost of living. Wages and benefits paid for a standard working week must at least come up to national living/minimum wage. Moreover, you should ensure regular working hours, proper breaks and holidays. Your employees should be able to work in safe and healthy working environments that comply with applicable safety standards.

We encourage suppliers to implement programmes and initiatives for employee development and training, and to promote a positive working environment. We consider investing in the development and well-being of your employees an important contribution to the long-term cooperation and success of all parties.

2.2.2 SOCIAL JUSTICE

The OP Group and its affiliated companies do not tolerate any form of discrimination, including discrimination based on gender, race, religion, nationality, disability or sexual orientation. As a supplier, you undertake not to accept discriminatory practices in your working environment and to ensure that all employees receive equal opportunities and fair treatment.

Additionally, you support your employees' right to freedom of association, collective bargaining and the conclusion of collective agreements.

2.2.3 HEALTH AND SAFETY

The health and safety of our employees is our top priority, and we expect you, as a supplier, to share this mindset and take all necessary measures to ensure a safe working environment for your employees and all persons working at your sites.

You must make sure that your production sites and working environments are safe and health-promoting. This includes identifying and assessing potential hazards, implementing appropriate protective measures and training your employees to educate them about risks and to promote safety-conscious behaviour. You should also have appropriate accident prevention, emergency preparedness and first aid measures in place. You should carry out regular safety inspections, risk assessments and audits, to ensure that your premises and work processes meet the highest safety standards. You should also maintain adequate documentation of your safety measures and procedures. You should, whenever necessary, provide employees with appropriate protective equipment and instruct them to use it.

As a supplier of the OP Group, we expect you to report accidents, injuries or incidents in the workplace promptly and take appropriate measures to minimise the risk of more incidents.

2.2.4 PROHIBITION OF FORCED AND CHILD LABOUR

The OP Group opposes any form of forced labour, child labour or exploitative labour. As a supplier, you undertake to respect these principles and ensure that your supply chain is free from such practices. The minimum age for employment must comply with national laws and international standards.

2.3 ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

2.3.1 OBLIGATION TO GIVE INFORMATION

As a company, we are firmly committed to making our contribution to achieving international sustainability goals. We are guided by major agreements such as the EU Green Deal (Fit for 55), the 2015 Paris Agreement and the goals of the Science Based Target initiative. In this context, we request you, as a supplier, to reduce your emissions and promote sustainable practices. We also expect regular and transparent reporting, ideally according to the CSRD standard, if

applicable. With these joint efforts, we strive to positively impact the environment and society, for sustainable business success and a sustainable future.

2.3.2 TECHNOLOGIES

The OP Group is aware of the importance of environmental protection and aims to establish sustainable practices in its operations. As a supplier, we expect you to embrace this commitment and do your part to protect the environment.

You should promote environmentally friendly technologies and practices that minimise the impact of your production processes and business activities on the environment. This includes reducing energy consumption, using paper and water resources efficiently and minimising greenhouse gas emissions.

2.3.3 WASTE

By promoting recycling, reuse and recovery of materials, you can reduce waste and environmental impacts. Handling, storage, transport and disposal of waste must not harm air, soil, water or the health of employees and must be carried out by qualified professionals. You must prevent explosions, ignitions and other sudden hazardous events. Suppliers must take measures to avoid and reduce waste.

Furthermore, it is a prerequisite that you comply with current and future country-specific and/or European laws regarding labelling requirements of product sales packaging and transport packaging.

2.3.4 CHEMICALS AND HAZARDOUS SUBSTANCES

You must make sure that all chemicals, paints and hazardous substances used are properly stored, processed and labelled to ensure that neither human beings nor nature are exposed to pollution and danger. In addition, you must strictly adhere to legal regulations such as REACH and POP.

The OP Group expects hazardous goods to be labelled and packaged in accordance with the legal requirements so that no negative consequences arise from improper handling. Furthermore, you must prove the legal requirement of a dangerous goods safety advisor if there are corresponding products.

2.3.5 PROCUREMENT OF RAW MATERIALS

As a supplier, you should implement green procurement practices by using sustainable materials and selecting suppliers who also comply with strict environmental standards. We expect you to incorporate environmental aspects into your supply chain and ensure that your own suppliers also address environmental issues responsibly. Together, we can help preserve the environment and promote sustainable growth.

It is important that you continuously take action to monitor and improve environmental impacts.

2.3.6 EUDR

The supplier guarantees that all products delivered to the OP Group which fall under the EU Deforestation Regulation (EUDR) are produced free of deforestation and comply with the legal requirements of the country of origin. The supplier shall provide the OP Group with all required EUDR information in due time and is liable for any violations.

2.4 SUPPLIER RELATIONSHIP

The OP Group considers its suppliers strategic partners and strives for long-term trust-based relationships. We believe in open and transparent communication and close cooperation with our suppliers in order to be successful together. You, as a supplier of the OP Group, contribute to our success, and we expect you to participate and cooperate actively.

We attach great importance to a fair and concerted supplier relationship based on the principles of reciprocal treatment, respect and benefit for both parties. We strive to conclude long-term relationships that offer stability and planning security. Nevertheless, we know that business requirements can change, and therefore, flexibility and adaptability are required.

We aim to continuously improve our supplier relationship and take on challenges together. This includes regular assessments of the performance and quality of your products and services. We expect you to monitor your performance continuously and strive to improve it. Feedback and constructive criticism are an integral part of our relationship, and we expect you to accept them openly and take action to improve.

The OP Group also expects you to meet agreed delivery dates and reliably complete orders. On-time delivery is critical for us to offer the best possible service

to our own customers. We expect you to have adequate production capacity and logistics in place to meet our needs and to pay attention to quality in terms of shipping packaging.

In the event of disagreements or conflicts, we focus on finding a fair and constructive solution. We prefer dialogue and negotiation in order to find solutions together. Should we still not be able to reach an agreement, we reserve the right to take appropriate measures to protect our interests.

3. COMPLIANCE AND INSPECTIONS

3.1 COMMUNICATION AND TRAINING

Close cooperation and regular communication are crucial to understanding our requirements and expectations and developing solutions together. We want to listen to your ideas and suggestions and allow you to be involved actively. At the same time, we expect you to respond to our requests and concerns promptly and professionally. In order to achieve this, we actively encourage openness, transparency and ethical communication both internally and while working with the OP Group.

We expect you to communicate the requirements of the the OP Group Supplier Code of Conduct and its implementation to the relevant stakeholders, and that you have appropriate measures in place to ensure compliance with the requirements. To guarantee this, you should provide your employees with continuous training and/or awareness-raising to ensure they have the necessary knowledge, skills and equipment to perform their jobs safely and effectively.

In addition, we encourage you to participate in industry-specific environmental initiatives, certifications or environmental management systems to further improve your environmental performance. The OP Group and its affiliated companies strive to work with suppliers who are actively committed to protecting the environment and implementing sustainable solutions in their business operations.

In the case of subcontractors or external service providers working on your behalf, we expect you to make sure that they also meet the standards laid down in this Code of Conduct and are properly trained and informed.

3.2 RISK MANAGEMENT

The OP Group and its affiliated companies consider risk management a crucial component of their business activities. We expect you, as a supplier, to implement effective risk management to identify, assess and control potential risks in your business operations.

You should conduct risk assessments to identify potential threats or uncertainties related to quality, delivery, compliance, the environment, health and safety. In doing so, you should assess the likelihood and potential impact of these risks.

Based on the identified risks, you should develop and implement appropriate risk mitigation measures. This may include, for example, implementing control systems, emergency plans or redundancy strategies.

It is important that you continuously monitor and review your risk management to ensure that your measures are effective and meet changing conditions. This may include regular reviews and updates of your risk assessments, control procedures and emergency plans.

In the event of risks or disruptions that could affect your ability to supply or the quality of your products, we expect you to inform us promptly and work together towards finding solutions to minimise any impact on our business.

As a supplier, you should also ensure that your own suppliers and subcontractors implement appropriate risk management procedures, especially if they supply critical materials or services.

Effective risk management is essential to identify and pro-actively address potential risks. As a supplier, we expect you to consider risk management an important aspect of your business and to take appropriate measures to minimise risks and ensure the continuity of your deliveries and the quality of your products.

3.3 VERIFICATION AND AUDITING

The OP Group reserves the right to verify compliance with this Supplier Code of Conduct. Inspections, audits or other appropriate procedures may be conducted for this purpose. As a supplier, you agree to cooperate fully during such inspections. We may take appropriate action in the event of violations of this Supplier Code of Conduct. This may include demanding corrective action or, in the case of repeat or serious violations, termination of the business relationship. We encourage suppliers to establish a reporting system to ensure compliance with the Supplier Code of Conduct and to drive continuous improvement.

3.4 REPORTING VIOLATIONS

You may report significant compliance violations in your company and ours, as well as in your supply chain, in particular illegal business practices, via an internet-based whistleblowing system available in multiple languages. The system allows a confidential dialogue with the OP Group secured by special

encryption and provides an anonymous platform for your employees to report violations.

<https://report-securely.eu/onlineprinters>

Additionally, you can report violations or suspected violations via your OP Group contact person. We also encourage you to establish your own whistleblower system to allow employees and other parties to report potential violations confidentially. We will reliably investigate any violation reported and take appropriate action to ensure that our business is conducted following the highest ethical standards.

4. FINAL PROVISIONS

Further contractual commitments remain unaffected by this Supplier Code of Conduct and take precedence over the provisions described in this document. This applies, in particular, to contractual commitments under which you are required to comply with certain ESG standards and/or requirements under supply chain legislation (e.g. the German Supply Chain Act).

We reserve the right to verify the individual aspects of this Supplier Code of Conduct and the Supply Chain Act using software. The tool checks all internet-based information about your company and also gives you the possibility to upload certificates and detailed descriptions of your individual situation in questionnaires.

4.1 CONTACT DETAILS FOR QUERIES

Please contact **compliance@onlineprinters.com** with any questions and suggestions regarding this Supplier Code of Conduct.



Scandinavian Print Group

