

INX's Supplier Code of Conduct

Preamble:

At INX International Ink Co., the human rights of our employees, those in our supply chain, and the communities in which we operate are respected. We strive to elevate our global supply chain, balancing today's best practice with sustainable advancements for future generations. We believe that with commitment and intent, only working with selected suppliers, providers, and affiliates who share our pledge to operate ethically, responsibly, safely and sustainably, will best serve us in our goal. It is our unwavering commitment to uphold that promise to all of the customers, communities and environments within our supply chain.

Purpose:

The purpose of this Supplier Code of Conduct is to establish minimum requirements for our suppliers worldwide. Working together, we can achieve great success by doing the right thing.

Suppliers of direct materials to INX must agree to uphold the requirements of this Supplier Code of Conduct by completing and returning the INX Supplier Code of Conduct Certification Form located on the last page of this Code of Conduct to INX's Corporate Sourcing department by mail at 1760 Western Drive, West Chicago, IL 60185, as a pdf attachment to Russell.Szadowski@inxintl.com, or by fax [630-681-7199]. This Supplier Code of Conduct may be updated from time-to-time and Suppliers may be asked to renew their compliance with the Code of Conduct, as needed.

This Supplier Code of Conduct outlines our expectations, as well as interactive processes to aid in our assessment of compliance with this Code of Conduct, including the following:

- **Verification** – Risk assessments are done to identify potential likelihood of potential human trafficking and slavery in the supply chain.
- **Audits** – INX will consider third party verification of any suppliers we suspect are involved in any activities that violate this Code of Conduct. If any evidence is found of human trafficking or slavery corrective measures will be taken.
- **Certification** – INX requires Suppliers to certify their compliance with this Code of Conduct.
- **Accountability** – INX requires that Suppliers report, without adverse consequence, if they believe that an employee of INX, or anyone action on behalf of INX has engaged in illegal or improper conduct, including human trafficking or slavery, in violation of this Code of Conduct. After a thorough investigation prompt and appropriate disciplinary action up to and including dismissal will be taken, and appropriate authorities will be notified as may be required. If a Supplier is found to be in violation INX will take corrective measures to rectify the situation.
- **Training** - The procurement team of INX has received training on this Code of Conduct, including with respect to human trafficking and slavery that addresses the identification, awareness and mitigating risks of such activities within the supply chain.

INX's Supplier Code of Conduct:

INX is committed to working together with our suppliers to source products and services responsibly, with uncompromising ethics and integrity. INX expects its suppliers, providers, partners and affiliates across the globe to comply with all local regulations, their national laws, and international standards governing:

- Working Hours & Compensation
- Forced Labor, Slavery & Human Trafficking
- Child Labor
- Conflict Minerals & Sustainable Sourcing
- Diversity & Inclusion
- Harassment & Abuse
- Occupational Health & Safety
- Third Party Representation
- Disciplinary Practices
- Business Integrity & Anticorruption
- Environment & Sustainability
- Conflicts of Interest
- Reporting Obligation
- Audit Rights

Additionally, INX recognizes international principles including the United Nations Universal Declaration of Human Rights, UN Global Compact, International Labour Standards (ILO), International Organization of Standardization (ISO) and the California Transparency in Supply Chains Act of 2010. For additional details, please see the links here:

- [Universal Declaration of Human Rights | United Nations](#)
- [Universal Declaration of Human Rights | OHCHR](#)
- [UN global compact](#)
- [The Ten Principles | UN Global Compact](#)
- [ILO Homepage | International Labour Organization](#)
- [Conventions and protocols \(ilo.org\)](#)
- [A Resource Guide - The California Transparency in Supply Chains Act - 2015 - California Department of Justice](#)
- [ISO - International Organization for Standardization](#)

Any and all violations of this Code of Conduct by Supplier are subject to dismissal from current and/or future engagements with INX.

A. Forced Labor, Slavery and Human Trafficking.

Supplier shall not directly (or indirectly through the use of subcontractors) use any forced or slave labor, and shall not engage in or support, directly or indirectly, human trafficking. Supplier shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment. If workers enter into employment agreements with Supplier, workers should do so voluntarily.

B. Child Labor.

Supplier shall not directly (or indirectly through the use of subcontractors) employ any children under 18 years of age unless legal and necessary and unless Supplier complies with the minimum employment age limit defined by national law where the person is working or by International Labor Organization ("ILO") Convention 138, whichever is higher.

C. Conflict Minerals & Sustainable Sourcing.

Supplier shall transparently establish and promote policies prohibiting the supply and use of Conflict Minerals. Supplier takes responsibility for their social, ethical and environmental activities conducted within the industrial sectors they participate in. Suppliers will actively monitor their supply chains through audits and assessments, managing risk, compliance and awareness to all regulatory, legislative and enforcement activities of the countries operated within.

- US: <https://www.state.gov/conflict-minerals/>
- US: <https://www.sec.gov/opa/Article/2012-2012-163htm---related-materials.html>
- EU: https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en
- EU: https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained_en

D. Diversity, Equality and Inclusion.

Supplier will hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual's performance and ability to do the job (except as required under collective bargaining agreements). Supplier will not discriminate based on a person's legally protected status in the country, state, province, county, municipality, or other region where that person is to be employed.

E. Harassment and Abuse.

Supplier will provide a workplace free from harassment, which can take many forms, including sexual, verbal, physical or visual behavior that creates an offensive, hostile, or intimidating environment.

F. Safety and Health.

Supplier will (i) endeavor to provide safe working conditions, (ii) provide its employees with appropriate protection from exposure to hazardous materials, and (iii) provide its employees with access to potable water and clean sanitation facilities. Supplier will follow the applicable health and safety laws, rules and regulations in the location(s) where Supplier has business operations.

G. Third-Party Representation.

Supplier will respect the decision of its employees to join and support a union as well as their decision to refrain from doing so where legally permitted.

H. Working Hours and Compensation.

Within the bounds of normal seasonal and other fluctuations in business requirements, Supplier will (i) maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms; and (ii) pay fair and timely compensation, including any required premium payments for overtime work.

I. Disciplinary Practices.

Supplier will not use corporal punishment or other forms of mental or physical coercion as a form of discipline.

J. Business Integrity and Anticorruption.

INX works diligently to conduct its business fairly, honestly and ethically and to comply with all applicable laws, and it expects the same behavior from its suppliers. Correspondingly, INX will not tolerate the giving or receiving of bribes by its officers, directors, employees, or anyone acting on its or their behalf. It does not matter whether the bribe is intended to benefit the individual, INX or some other person or entity. Supplier shall not bribe, or offer or give, directly or indirectly, any financial or other advantage to any officer, director, or employee of INX, or anyone acting on its or their behalf, or to a governmental official for, or on behalf of, or at the behest of INX.

Supplier shall immediately report to INX any request for (i) a bribe or for any financial or other advantage that Supplier receives from an officer, director or employee of INX or anyone acting on its or their behalf, or (ii) any request by an officer, director or employee of INX or anyone acting on its or their behalf to make a payment to any third party including government officials. Supplier will promote honesty and integrity in its business conduct by raising ethical awareness among its employees and providing direction and education on ethical issues.

K. Environment and Sustainability.

Supplier will work to continuously improve its environmental performance to reduce the environmental impact of its business activities and operations.

L. Conflicts of Interest.

Employees of INX should act in the best interest of the Company. Accordingly, employees should have no relationship, financial or otherwise, with any Supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of the Company. For example, Suppliers should not employ or otherwise make payments to any employee of INX during the course of any transaction between the Supplier and the Company.

Friendships outside of the course of business are inevitable and acceptable, but Suppliers should take care that any personal relationship is not used to influence any INX employee's business judgment. If a Supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or same or opposite sex domestic partner) to an employee of INX, or if a Supplier employee has any other relationship with an employee of INX that might represent a conflict of interest, the Supplier should disclose this fact to INX.

M. Reporting Obligation.

Suppliers who believe that an employee of INX, or anyone acting on behalf of INX, has engaged in illegal or improper conduct, including conduct prohibited under this Code of Conduct should report the matter to INX. Supplier can contact the INX General Counsel at 630-382-1800 or email our dedicated “Speak-Up” program at SpeakUp@inxintl.com. All concerns will be investigated. A Supplier’s relationship with INX will not be affected by an honest report of potential misconduct.

N. Audit Rights.

INX reserves the right, directly or through third party auditors, to verify Supplier’s compliance with this Code of Conduct and, upon request, Supplier shall certify its compliance with this Code of Conduct in writing. Failure to comply with such a request or a violation by Supplier of this Code may result in termination of Supplier’s relationship with INX.

INX Supplier Code of Conduct Certification Form

The undersigned, a duly authorized official of the below-named Supplier to INX International Ink Co. hereby confirms and certifies that, after due enquiry, it is in compliance with INX's Supplier Code of Conduct and that it intends to remain in compliance with such Code of Conduct for as long as it is a Supplier to INX.

Without limiting the generality of the foregoing, the undersigned specifically confirms and certifies:

per the California Transparency in Supply Chains Act of 2010, that it does not directly (or indirectly through the use of subcontractors) use any forced or slave labor and shall not engage in or support, directly or indirectly, human trafficking and that materials incorporated into the products it sells to INX comply with the laws regarding slavery and human trafficking of the country or countries in which it does business;

Print name of Supplier: _____

Signature of Authorized Signatory: _____

Print name and title of position: _____

Date: _____

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