



# Lexmark Supplier Code of Conduct

## Table of Contents

Introduction..... 1

1. Business Ethics.....2

2. Human Rights and Labor standards.....3

3. Occupational Health and Safety.....5

4. Environmental Sustainability .....5

## Introduction

Lexmark is committed to operating in a socially and environmentally responsible manner in all areas of our business, and this responsibility extends to our global supply chain. Lexmark’s Supplier Code of Conduct (“Code”) defines our expectations for suppliers regarding ethical behavior, sustainable environmental practices, and protection of the health, safety, dignity and fundamental rights of all workers. The Code is built on internationally recognized agreements that promote companies’ management of adverse effects on human rights, labor rights, employee safety, environmental protection and anti-corruption practices. Lexmark suppliers’ compliance with the Code includes compliance with the following standards which are incorporated into the Code:

- Responsible Business Alliance (RBA) Code of Conduct available at: <https://www.responsiblebusiness.org/>
- United Nations (UN) Global Compact
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights and UN connected conventions
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

### Who does the Lexmark Supplier Code of Conduct apply to?

We require the adoption of the Code by our suppliers and subcontractors and expect them to adopt, at a minimum, a similar dynamic approach within the sphere of their own direct and indirect suppliers. The Code applies to all suppliers that provide products or services to Lexmark, or that are engaged or instructed to act for or on behalf of Lexmark. Compliance to the Code will comprise an important component of supplier selection and evaluation. It is the responsibility of the supplier to ensure

subcontractors are informed of the Code and uphold the requirements. If a supplier is aware that a subcontractor does not comply with such requirements Lexmark must be immediately notified.

We are aware that not all Code standards will apply to our suppliers. We expect suppliers to abide by those standards which are relevant to their specific business activities.

### **Governance and legal compliance**

It is essential that our suppliers comply with all applicable national laws and regulations and meet the requirements in the Code. The Code does not replace legislation and if the two are in conflict, the stricter standard shall apply. The Code is valid in the English language. Where there are different language versions of this document, these should be considered translations only.

### **Audits and assessments**

To ensure conformity to legal and regulatory requirements, contractual requirements related to social and environmental responsibility, and the content of this Code, suppliers are expected to perform periodic facility self-evaluations. Suppliers will allow a Lexmark-conducted or third-party social and environmental responsibility audit on the physical premises where supplier manufactures products or provides services to Lexmark.

## **1. Business Ethics**

Suppliers should adhere to the highest ethical and business practice standards in the industry. Suppliers are expected to comply with any applicable anti-corruption and/or anti-bribery laws.

### **1.1 Intellectual property**

Suppliers are expected to avoid any conflict of interest and comply with the disclosure of information in accordance with regulations and industry practices. Lexmark expects suppliers to protect all confidential information and respect the intellectual property of Lexmark and others.

### **1.2 Fair business, advertising and competition**

Suppliers should uphold standards of fair business, advertising and Antitrust and Competition Laws (i.e. not engaging in price fixing, market sharing, bid rigging, and customer allocation).

### **1.3 Protection of identity and non-retaliation**

Programs should be in place that protect the identity and privacy of suppliers and employees. A process should exist to raise ethical concerns without fear of retaliation.

### **1.4 Privacy**

Suppliers should protect the reasonable privacy expectations of personal information and comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **1.5 Bribery and Corruption**

Suppliers should prohibit all forms of bribery, conflicts of interest, corruption, fraud, extortion, embezzlement and unlawful kickbacks. Suppliers should not engage in, or cause Lexmark to engage in, any form of corrupt activities. Suppliers should comply with applicable anti-corruption and anti-bribery laws and regulations, including applicable provisions of the Foreign Corrupt Practice Act (FCPA). The FCPA applies to United States individuals and companies, including their controlled international subsidiaries.

## **2. Human Rights and Labor standards**

Lexmark is committed to protecting the rights of our employees and those of our suppliers in the countries where we operate. As our supplier we request that you provide a positive work environment for your employees with balanced working time arrangements that meet or exceed the requirements dictated by local laws, regulations and international standards.

Our support for these principles is embedded in the [Lexmark Human Rights Policy](#), the [Lexmark Human Trafficking and Slavery Statement](#) and the [Lexmark Corporate Social Responsibility Policy](#). Our business operations as well as supplier relationships are guided by these principles.

As a supplier you are committed to uphold the human rights of workers, and to treat them with dignity and respect.

### **2.1 No discrimination, harassment and diversity**

Lexmark values and promotes diversity and gender-balance. Lexmark expects its suppliers to provide a work environment where everyone is treated with respect and dignity and is given fair and equal opportunities for development. Lexmark does not tolerate any form of discrimination or harassment in the workplace. Suppliers shall not discriminate based on ethnicity, religion, race, skin color, nationality, social origin, age, disability, health status, gender, sexual orientation, membership of trade unions or political views (as described in the ILO convention no. 111).

### **2.2. Working hours, wages and benefits**

Suppliers ensure working conditions, hours, rest periods, leave, minimum wages and overtime compensation are in accordance with local regulations and industry practice and are at a level that enables a fair standard of living according to local conditions. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers should be allowed at least one day off every seven-day. In addition, wages may not be withheld as a disciplinary sanction (as described in the ILO conventions no. 1, 14, 30, 95, 106, 131, 132 and 155).

### **2.3. Privacy**

Suppliers respect employees' right to privacy when collecting or storing personal information (as described in the ILO Code of Practice on Protection of workers' personal data).

## **2.4. Freedom of association and collective bargaining**

Suppliers respect employees' right to organize themselves and negotiate collective wage agreements. If independent trade unions are either discouraged or restricted, the supplier enables workers to gather independently to discuss work-related issues (as described in the ILO conventions no. 87 and 98).

## **2.5. Freely chosen employment and humane treatment**

Suppliers are not associated with human trafficking or any type of forced labor. This includes work on a forced contract, slavery and other forms of work that are done against a worker's will or choice (as described in the ILO convention no. 29 and 105).

All work must be voluntary. Workers are free to leave work at any time or terminate their employment. A description of the terms and conditions of employment should be provided to all workers in their native language. Employers may not hold or deny access by workers to their identity or immigration documents. Workers should not pay recruitment fees or other related fees for their employment without repayment.

## **2.6. Child labor**

Suppliers are not associated with exploitative forms of child labor - such as labor that damages children's physical or mental health or prevents them from going to school. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labor is not to be used in any stage of manufacturing or in the provision of services or supplies.

Workers under the age of 18 ("young workers") shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. When employing young workers, suppliers must act in accordance with the International Labour Organization's standards (as described in the ILO conventions no. 138 and 182). Suppliers should ensure proper management of student workers and provide appropriate support and training. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks

## **2.7 Responsible sourcing of minerals**

Suppliers should exercise due diligence to reasonably assure that conflict minerals (tantalum, tin, tungsten, gold and cobalt) in the products provided to Lexmark do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in regions with high risk. Suppliers of products containing these minerals must report the origin, smelter and due diligence identification process to Lexmark.

## 3. Occupational Health and Safety

The health and safety of our employees is a priority for Lexmark. We strive to offer workplaces free from unsafe equipment, situations and practices and expect our suppliers to do the same. We encourage our suppliers to document a Health and Safety plan using a recognized management system such as OHSAS 18001/ISO 45001 or ILO Guidelines in Occupational Safety and Health.

### 3.1 Occupational safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles and fall hazards) are to be identified and assessed, and controlled through proper design, engineering controls, preventative maintenance and safe work procedures and ongoing safety training.

### 3.2 Emergency preparedness and disaster recovery

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.

### 3.3 Occupational injury and illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness.

### 3.4 Industrial hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated and controlled. Plans and processes should be in place to address physically and psychologically demanding work and machine safeguarding. Suppliers should provide clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities.

### 3.5 Training and Education

Workplace health and safety education and training should be provided to workers in their primary language regarding the tasks they will perform. Health and safety information should be posted in the facility or placed in a location accessible by workers. Suppliers should implement procedures and programs that identify and prevent health and safety risks.

## 4. Environmental Sustainability

Our operations include high standards of environmental performance to minimize our environmental footprint. We continuously monitor those standards and seek ongoing improvement. We encourage our suppliers to also maintain diligent focus in this area driven by a goal of continuous improvement by documenting an environmental management plan using a recognized management system such as ISO 14001.

#### **4.1 Environmental permits and reporting**

Lexmark recommends all suppliers with significant environmental impact to implement certifiable environmental management systems that facilitate the supplier's work with the environment. All required environmental permits and registrations are to be obtained, maintained and kept current.

#### **4.2 Pollution prevention, natural resources protection and resource reduction**

As a core principle, protection and conservation of natural resources should be a supplier priority. Technologies and practices should be developed to prevent pollution, reduce greenhouse gases, and preserve water and biodiversity. Emissions and discharges of pollutants and generation are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production and facility processes. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by minimizing material sent to the landfill and recovering and reusing materials to favor the circular economy.

#### **4.3 Hazardous substance identification and management**

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

#### **4.4 Wastewater and solid waste management**

A systematic approach to identify, manage, reduce and responsibly dispose of or recycle wastewater and solid waste shall be implemented.

#### **4.5 Air emissions monitored, controlled and treated**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized.

#### **4.6 Adherence to product material restrictions**

All materials, components, parts, assemblies and packaging supplied to Lexmark must adhere to all applicable laws, regulations and customer requirements regarding restriction of specific substances in products and manufacturing. Supplier must also adhere to the requirements in the [Lexmark Product Environmental Specification](#).

#### **4.7 Water, energy and greenhouse gas emissions**

The monitoring of water sources including use and discharge, conservation and contamination control should be implemented. Energy consumption and greenhouse gas emissions should be tracked and documented while seeking cost-effective methods to reduce and reuse water and minimize energy consumption and greenhouse gas emissions.

*Balance of page intentionally left blank.*