CODE OF BUSINESS CONDUCT
2018

Table of Contents

Letter From the Executive Management Committee Chairman 4

Introduction 5

Lexmark's Work Environment 6

- Equal Employment Opportunity 6
- Discrimination and Harassment 6
- Employee Privacy 6

Personal Conduct 7

- Drugs and Alcohol 7
- Violent Behavior and Weapons 7
- Offensive Behavior 7
- Corporate Policy Compliance 7
- Use of Lexmark Time and Assets 7
- Travel and Entertainment 8
- Handling of Sensitive Information 8
- Recording and Reporting Information 8
- Reporting Possible Violations of Laws and Policies 8
- Disclosure and Use of Confidential and Proprietary Information 9
- External Communications 9
- Software 10

Conflicts of Interest 11

- Competing Against Lexmark 11
- Supplier Affiliations 11
- Business Gifts and Amenities 11
- Personal Financial Interests 12
- Publicly Traded Securities 12
- Closely Held Organizations 12
- Employment of Relatives and Related Persons 12
- Someone Close to You Working in the Industry 12
- Political and Community Service 13

Accounting Records, Internal Controls and Audits 14

Complying With Laws and Regulations 15

- General 15
- Antitrust and Competition Laws 15

Bribes, Kickbacks or Other Corrupt Transactions 16
Corrupt Transactions and Third-Party Relationships 16
Copyrightable Material 17
CFIUS and United States Government Imposed Communication Restrictions 17

Supplier Relationships 18
Avoid Reciprocal Dealing 18

Customer Relationships 19
Premature Disclosure 19
Truth in Advertising 19
Commission for Referrals 19
Relationships With Government Customers 19

Competitor Relationships 20
Fairness in the Field 20
Disparagement 20
Business Contacts With Competitors 20

Information Concerning Others 21
Data Privacy 21
Acquiring Information 21
Using Information 21
Information Owned by Others 21

Corporate Social Responsibility 23

Key Contacts 24

Letter from the Executive Management Committee Chairman

Dear Lexmark Colleague,

As we focus on achieving profitable growth for Lexmark, we must understand that our success is driven not only by our commitment to our customers, but also by conducting ourselves ethically, legally and fairly in all of our business dealings.

It is the responsibility of every Lexmark employee to comply with our legal and ethical obligations when dealing with customers, employees, business partners, competitors and suppliers everywhere in the world. The Lexmark Code of Business Conduct serves as a guide to ensure that all of our business dealings are conducted with trust and integrity — consistent with our Vision, Mission and Values.

As a Lexmark employee, you are expected to read, understand and live by this Code of Business Conduct. Since the code cannot address every situation or issue that could arise in our business environment, you should discuss the code with your manager or call the Ethics Line at 1-866-477-2029 if you have questions.

Thank you for taking the time to read the Code of Business Conduct and, more importantly, for conducting your business dealings in a manner consistent with these guidelines.

Allen Waugerman
Chairman, Lexmark Executive Management Committee

Introduction

At various times in our careers, each of us will face situations that present ethical and legal questions related to how we conduct Lexmark's business. Lexmark's policy regarding ethical behavior is straightforward and clear:

We will conduct ourselves ethically, legally and fairly in all our dealings with customers, employees, governmental entities, business partners, competitors and suppliers everywhere in the world.

While our policy is clear, its application in a specific situation might not be. Lexmark's Code of Business Conduct has been developed to assist employees in these situations. The Code is designed to provide guidance regarding certain ethical and legal considerations, not to replace existing Lexmark policies and procedures. All Lexmark employees are personally responsible for reading, understanding and complying with this Code. Any waiver of the Code must be approved by Lexmark's Ethics Committee, unless otherwise specified. An employee who does not comply with the Code is acting outside the scope of his/her employment and may be subject to disciplinary action, up to and including termination of his/her employment with Lexmark. Managers who condone questionable or improper conduct from their employees who participate in such activity or who fail to take corrective action when such matters are brought to their attention, may also be subject to disciplinary action, up to and including termination of his/her employment with Lexmark. Any reports related to violations of Lexmark's Code of Business Conduct will be investigated promptly and corrective action will be taken as appropriate.

Lexmark operates in many different countries and cultural environments. This Code is meant to apply to Lexmark, its subsidiaries and employees around the world. If local legal or cultural practices are inconsistent with the guidance provided in this Code, employees should discuss the appropriate course of action with their manager, based on the intent and spirit of this Code. Any substantive deviation from this Code due to local legal or cultural considerations must be approved in writing by the Ethics Committee.

While any set of guidelines cannot answer all possible ethical dilemmas we might encounter, this Code provides sufficient guidance to enable each of us to reach the correct conclusion or identify those situations where we should seek guidance from appropriate persons within Lexmark. If you have any questions in interpreting or applying this Code, it is your responsibility to consult with: your manager, Lexmark's Human Resources Department, Lexmark's Legal Department or the Director of Internal Audit. You may also ask a question by using the Ethics Line.

An Ethics Committee — co-chaired by the Senior Vice President and Chief Human Resources Officer and the Senior Vice President, General Counsel and Secretary — has been established to oversee Lexmark's ethics program, including the revision and interpretation of this Code.

For purposes of the Code, "Executive Management" refers to the Chief Executive Officer and direct reports to the Chief Executive Officer.

Lexmark's Work Environment

Equal Employment Opportunity

Lexmark is committed to equal employment opportunity. All Lexmark employment-related activities will be conducted without regard to race, color, age, gender, sexual orientation, gender identity, religion, national origin, disability, veteran status, or any other characteristic or factor protected by applicable law.

Discrimination and Harassment

Lexmark strives to provide all employees with a healthy, safe and productive work environment. Harassment or discrimination based on race, color, religion, gender, sexual orientation, gender identity, age, national origin, disability, veteran status or any other characteristic or factor protected by applicable law has no place at Lexmark or at any Lexmark activity. This includes, but is not limited to, sales calls, trade shows, off-site meetings, training events, team-building activities, Lexmark social functions and customer or supplier entertainment activities or events.

If you think you have been the victim of such conduct at Lexmark, or have witnessed it occurring, you have an obligation to report it as soon as possible to your manager or the Human Resources Department. All complaints of such conduct will be investigated promptly and dealt with appropriately. You will not be retaliated against for reporting such conduct, and you will not be subject to disciplinary action as long as you have not engaged in any improper activity.

Employee Privacy

Lexmark is committed to following responsible personal data management and protection practices and complying with applicable law. The only personal data, including medical and benefit information, that Lexmark collects or maintains is that which is necessary for employment-related business purposes. Employees responsible for collecting, using, disclosing or maintaining employment-related personal data must ensure that it is processed in accordance with Lexmark's Privacy Policy.

Computers, communications equipment, telephones, offices, workspaces, desks, and all other equipment, facilities, systems, or services provided by Lexmark , and the information or documents (whether paper or electronic) created or stored on, by, or in them, are the property of Lexmark. As a result, Lexmark management has the right to access those assets. Except for small items of a personal nature (such as pictures and memorabilia), any personal items, files, electronic data, voicemail, email, etc., that you consider private should not be kept in or on equipment, media, services, or facilities provided to you by Lexmark.

Lexmark has the right, but not the obligation, to inspect and monitor the use of its facilities, data, systems, services, and equipment to ensure that Lexmark assets are being properly used and that employees are complying with Lexmark's policies and procedures and with applicable laws and regulations.

Personal Conduct

Lexmark's reputation for maintaining the highest standards of business conduct rests on our daily actions. Each of us is responsible for acting in the best interests of Lexmark and for conducting ourselves in accordance with this Code as we engage in any Lexmark activity. This includes, but is not limited to, sales calls, trade shows, off-site meetings and training events, team-building activities, Lexmark social functions and customer or supplier entertainment activities or events.

Drugs and Alcohol

The use, possession, manufacture, distribution or sale of drugs or other controlled substances (except where use is authorized by appropriate medical personnel to treat a bona fide medical condition of the person possessing them) or alcohol (except where approved by Executive Management) is prohibited on Lexmark property.

Under no circumstance should you be on Lexmark property, in any Lexmark work environment or engaged in any activity for Lexmark if you are under the influence of, or affected by, such drugs, controlled substances or alcohol.

Violent Behavior and Weapons

Violent behavior, or the threat of violent behavior, even if made in jest, is not acceptable conduct. To the maximum extent permitted by law, Lexmark prohibits your possession of a weapon while you are on Lexmark premises or when you are engaged in any activity for Lexmark.

Offensive Behavior

Offensive language; racial, ethnic or religious slurs; or other remarks, jokes or conduct which encourage or permit an offensive work environment or diminish the worth of another person are not acceptable. This is true even if others do not seem to object.

Corporate Policy Compliance

Complying with Lexmark's corporate policies and procedures is vital to the ongoing success of our company. Lexmark employees worldwide are expected and directed to comply with all Lexmark corporate policies. It is each employee's responsibility to know and understand policy requirements as they apply to their job, and to notify management when they believe a violation of corporate policies has occurred. Violations of corporate policies will result in disciplinary action up to and including termination.

Protecting Lexmark Assets

Each of us is personally responsible for protecting Lexmark assets entrusted to us and for protecting Lexmark assets in general. You should be alert to any situations or incidents that could lead to the loss, misuse or theft of Lexmark assets, including Lexmark data and third party data entrusted to Lexmark.

Use of Lexmark Time and Assets

You may not perform non-Lexmark work or solicit non-Lexmark business on Lexmark premises or while working on Lexmark time. Lexmark facilities, systems and equipment are provided solely for the purpose of conducting Lexmark business. You are not permitted to use Lexmark equipment, systems, telephones, materials, resources or proprietary information for any non-Lexmark business, with the only exception of ***very limited and reasonable*** use of telephones, computer systems (including e-mail and internet) and

printers for personal matters; however, you will not have any privacy rights in any such use except to the extent required by applicable law. In no case are you allowed to access, store or communicate anything inappropriate for a professional business environment including, but not limited to, information items or internet sites of a harassing, offensive, discriminatory, illegal or sexually explicit nature or sites that involve gambling, copyright infringement, or that otherwise violate Lexmark policy or applicable laws.

You should protect company assets and their efficient use. Theft, carelessness and waste have a direct impact on Lexmark's profitability and should be prevented.

Travel and Entertainment

You must ensure that all business travel furthers Lexmark's interests and that all travel and entertainment expenditures are reasonable and in compliance with applicable Lexmark policies. You also must exercise good judgment when traveling on Lexmark business and when organizing and participating in any Lexmark entertainment activity or event, whether formal or informal. Under no circumstances should you organize or participate in any Lexmark entertainment activity or event, whether formal or informal, including customer or supplier entertainment activities or events that would violate this Code or any Lexmark policy.

As a representative of Lexmark, you should understand that certain activities and venues are not appropriate for conducting business, entertainment or meetings. This includes businesses such as sexually oriented businesses or any other venue or activity that would reflect negatively on Lexmark.

Handling of Sensitive Information

You should not discuss or communicate sensitive Lexmark information with anyone inside or outside of Lexmark, except Lexmark employees with a legitimate business need to know. In conveying sensitive information, you should be aware of who might overhear your conversation or view your communication. When in public locations such as airports, airplanes, and restaurants, you should consider the risk and opportunity for eavesdropping either by overhearing the conversation or other electronic eavesdropping before you discuss or communicate sensitive information.

Recording and Reporting Information

Accurate and timely information is critical to the effective, efficient and profitable operation of Lexmark. You must record and report all information accurately and honestly, including but not limited to information contained in time and attendance reporting, invoices and other accounting reports and documents. Information must not be organized in a way that is intended to mislead or misinform those who receive it.

Inaccurate or misleading reporting of information to organizations or individuals within or outside Lexmark is strictly prohibited. Full, fair, accurate, timely and understandable disclosures within reports, documents and in public communications made by the Company are required. In addition to any disciplinary action you may face, violation of this provision could lead to civil or even criminal liability for you and Lexmark.

Reporting Possible Violations of Laws and Policies

If you become aware of any questionable or improper accounting, financial reporting or auditing matters or of any violation or possible violation of a law, rule or regulation, Lexmark policy, procedure or provision of this Code of Business Conduct, you have an obligation to promptly notify a member of your direct management chain, Lexmark's Human Resources Department, Lexmark's Legal Department, the Director of Internal Audit or the Chief Executive Officer. If you are reluctant to report a possible violation to your manager because, for example, he or she might be personally involved, you should report it through one of the other options listed above or by using the Ethics Line if the options above are not feasible. You may choose to remain anonymous if you wish when using the Ethics Line and any report will be treated confidentially.

A listing of contacts and phone numbers are provided at the end of this document.

You will not be retaliated against for making the report, and you will not be subject to disciplinary action as long as you did not participate in the violation. Reasonable efforts will be made to protect your identity if you so request.

As a Lexmark employee you also have a responsibility to participate and cooperate openly and honestly in any internal investigation of misconduct or wrongdoing.

Defend Trade Secrets Act of 2016 Notice: Notwithstanding anything in this Code of Conduct or the Employee Handbook to the contrary, an individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that is made (1) in confidence to a Federal, State or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law; or (2) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret(s) to the attorney of the individual and use the trade secret information in the court proceeding if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

Disclosure and Use of Confidential and Proprietary Information

During the course of your employment at Lexmark, you will be exposed to information related to Lexmark's operations. This information includes the business, financial, sales and marketing, personnel and services plans of the business. You may also have access to proprietary information such as: research and development, design, engineering and manufacturing know-how and processes. This information represents a valuable Lexmark asset and should be used only in connection with Lexmark business.

Information concerning Lexmark should be considered for internal use only. If you have any doubt about whether particular information should be shared outside Lexmark with suppliers, business partners, customers, etc., you should consult with your management prior to any disclosure.

When you create content, you must label the content appropriately in compliance with Lexmark's Data Classification Policy. Certain information may be classified as confidential or restricted confidential. In these cases, Lexmark alone is entitled to determine what use may be made of the information and with whom it may be shared. Your obligation not to disclose confidential information continues even after your employment with Lexmark ends.

External Communications

Individual employees may not communicate any information related to the Company's performance or business activities that has not yet been made public through the Global Communications Department.

All inquiries from the media, other than those related to Lexmark's existing product offerings or routine operations in non-U.S. locations, should be directed to Global Communications. In non-U.S. locations, all communication with the media is to be limited to local senior management or designated public relations representatives. Regardless of location, any inquiries of a potentially negative nature should be directed to Global Communications. Inquiries from outside attorneys, regulators or government agencies should be directed to Lexmark's Legal Department or, in the case of tax matters, Director, Global Corporate Tax.

All external communications must be consistent with Lexmark policy, including but not limited to those outlined in the Social Media Policy and this Code of Business Conduct. In addition, no external communication, including ones made through a personal communication channel such as personal e-mail or any form of online posting, publishing or discussion group, may discredit Lexmark, its products, employees or business interests. T

Software

Most software products purchased by Lexmark are regulated by some form of licensing agreement which describes the terms, conditions and allowed uses of the software. Lexmark respects copyright laws and observes the terms and conditions of all license agreements. All software installed on Lexmark computers or equipment must be licensed to Lexmark or the license must be approved by Global Sourcing. Any non-Lexmark software installed must be properly licensed and must not jeopardize the security or stability of the network. In addition, you may not install Lexmark licensed software on non-Lexmark computer systems, without first ensuring the terms of Lexmark's license agreement allows such usage. You may not download or otherwise copy any part of a software program for any reason, including development work, unless Lexmark has obtained the rights to do so.

A conflict of interest may arise if you engage in any activity or advance any personal interests at the expense of Lexmark's interests. You are expected to avoid situations in which you could be, or appear to be, unduly influenced by factors which may prevent you from acting in the best interests of Lexmark. You may not personally take advantage of opportunities that you discover through your use of Lexmark property, information or through your position with Lexmark. Accordingly, you are required to review your specific situation with your manager or the Ethics Committee to assess the nature and extent of any concern and how it can be resolved.

Competing Against Lexmark

You may not engage in any activity or provide assistance to another individual or organization that markets products or services that compete with Lexmark's. You must consult with your manager before pursuing any activity that might create a conflict of interest with Lexmark.

Supplier Affiliations

Generally, without the prior written approval of the Ethics Committee, you may not be a supplier to Lexmark, represent a supplier to Lexmark, work for a supplier to Lexmark or be a member of a significant supplier's board of directors while you are an employee of Lexmark. In addition, you may not accept money or benefits of any kind for any advice or services you may provide to a supplier in connection with its business with Lexmark.

Business Gifts and Amenities

Except as noted below, neither you nor members of your family may accept or give gifts or gratuities of any type from or to any supplier, prospective supplier, business partner, channel partner or other customer. Gifts include merchandise, travel expenses to business meetings or events, entertainment, or any other item of value. However, you may give or accept promotional gifts of nominal value (no more than US$25 or its equivalent in other currencies), such as advertising novelties, in the spirit of commercial politeness. You should consider whether the frequency or timing of any gift might create the appearance of a conflict of interest. Gift cards may not be purchased or distributed to employees, contractors, customers, or suppliers. Any exceptions must be approved by a member of Executive Management. Giving or receiving cash payments of any kind is not allowed.

In very limited situations, it may sometimes be necessary to exchange gifts of greater value to avoid offending the cultural values of a supplier or customer. Any such situation must be reviewed and approved by a member of Executive Management.

You may give or accept such customary business amenities as meals; provided the expenses involved are kept at a reasonable level and their acceptance would not embarrass Lexmark if they were disclosed publicly. Unless Lexmark has specified to the contrary, you may accept promotional premiums and discounts offered by transportation companies, hotels, auto rental agencies and restaurants when they are offered on the same basis to travelers generally.

If you are offered money or a gift, you should decline the offer and inform the party of Lexmark's gift policy. If you receive money or a gift, you should inform your manager immediately. Your manager can help you make appropriate arrangements to return or donate the gift and, where appropriate, remind the giver of Lexmark's gift policy.

Personal Financial Interests

Without the prior written approval of the Ethics Committee, you should not have a financial interest in any organization that does business with or competes with Lexmark if that interest might cause you to have a conflict of interest, or the perception of a conflict of interest, with Lexmark. Such organizations include suppliers, competitors, customers and distributors or organizations that remarket Lexmark products or services.

Publicly Traded Securities

You should not hold a financial interest in a publicly traded company if the combination of your job, the amount of your investment, and the particular company in which you invested when viewed objectively by another person, could appear to influence your actions as a Lexmark employee.

In the case of a supplier, if you are involved in deciding whether Lexmark does business with that supplier, you should not have any financial interest in that company.

These guidelines cannot be avoided by acting indirectly through another person or organization.

Closely Held Organizations

Investments in closely held organizations (typically, closely held corporations, partnerships or sole proprietorships) are likely to cause concern because the ties between closely held organizations and their investors tend to be more significant and extensive than those between other organizations and their investors. For example, there are generally relatively few investors or owners of such companies, giving each a greater stake in its ownership and a higher likelihood of participating in the company's day-to-day operations.

For these reasons, you may not make any investment in a closely held organization that is a competitor, supplier, distributor or organization that re-markets Lexmark products or services. Exceptions must be specifically pre-approved by the Ethics Committee.

Employment of Relatives and Related Persons

Lexmark selects employees based upon their qualifications and the needs of the company.

Lexmark recognizes that persons who are relatives of employees or who are in personal relationships with employees can be a potentially valuable source of qualified candidates. Nevertheless in both the hiring and management of such persons, Lexmark wishes to avoid conflicts of interest or partiality or the appearance of such. Employees may not manage, supervise or otherwise report to anyone, even with an intermediate manager or managers in between, with whom they have a close personal relationship such as a relative, domestic partner, romantic partner or cohabitant.

You are required to disclose such relationships, and you should review your specific situation with your manager and the Lexmark Human Resources Department to assess the nature and extent of any concern and how it may be resolved.

Someone Close to You Working in the Industry

If your spouse, another member of your immediate family, or someone else to whom you are close with works for or is a competitor or supplier of Lexmark, the closeness of the relationship might lead you to inadvertently compromise Lexmark's interests or create an appearance of a conflict of interest. Accordingly, you are required to review your specific situation with your manager and the Lexmark Human Resources Department to assess the nature and extent of any concern and how it can be resolved.

Political and Community Service

Lexmark encourages you to be active in the civic life of your community. However, such service might, at times, place you in a situation that poses a conflict of interest with Lexmark. Depending on your position in Lexmark and whether you stand to gain personally, the situation might require you to abstain from certain decisions. Regardless of whether you abstain, you should make it clear that you are a Lexmark employee to avoid any charge of trying to conceal your association with Lexmark.

Lexmark has adopted a corporate giving policy. The policy describes Lexmark's commitment to the communities in which the company operates by providing financial, product and, volunteer assistance for schools and non-profit organizations considered registered charities. Under this policy Lexmark employs strict criteria in determining eligibility for donations. For instance, Lexmark will not contribute funding or in-kind gifts to political, labor, fraternal, or religious organizations, individuals, or organizations that discriminate on the basis of race, color, creed, gender, age, sexual orientation, or national origin. All charitable donations must be pre-approved by Human Resources.

Lexmark will not pay you for time spent running for public office, serving as an elected official or campaigning for a political candidate, unless required by law. You may, however, take reasonable time off without pay for such activities, if your Lexmark duties permit the time off and your manager approves it. You also may use vacation time for political activity.

When you participate in community activities or speak publicly regarding community or political issues, ensure that you do so as an individual. Do not speak or act on Lexmark's behalf unless specifically authorized to do so by a member of Executive Management.

Accounting Records, Internal Controls and Audits

Lexmark is legally required to maintain accounting records that accurately and fairly reflect its financial activities and to devise and maintain a system of internal control sufficient to provide reasonable assurance that transactions are appropriately authorized and recorded. Ensuring these requirements are met is a responsibility shared by each of us.

Lexmark, external auditors, third parties and various governmental agencies routinely conduct audits of various aspects of the Company's operations. You are not to provide false, misleading or incomplete information to anyone conducting these audits. If you do so, in addition to any disciplinary actions you may face, you and/or Lexmark may be subject to civil or criminal liability.

Complying With Laws and Regulations

General

It is Lexmark's policy to comply with all laws, rules and regulations. Lexmark is organized under U.S. law. As a result, its operations are governed primarily by U.S. laws, rules and regulations.

Lexmark operates through subsidiaries, branches and other legal entities in many countries outside the United States and is subject to the laws, rules and regulations of those countries and jurisdictions as well. Where there is a conflict between U.S. law and the laws of another country, the issue is to be resolved by management with the concurrence of Lexmark's Legal Department or, in the case of tax matters, the Director, Global Corporate Tax.

All investigations by governmental authorities, other than tax matters, are to be managed by Lexmark's Legal Department. Tax matters are to be managed by the Director, Global Corporate Tax. You are required to contact Lexmark's Legal Department or the Director, Global Corporate Tax as soon as possible regarding an inquiry from any governmental authorities or from other parties who have filed, or expressed their intention to file, a lawsuit involving Lexmark.

Antitrust and Competition Laws

The purpose of competition laws (also known as antitrust, monopoly, fair trade or cartel laws) is to preserve and foster fair and honest competition within a competitive market system.

Under these laws, Lexmark may not enter into agreements with other companies (whether formal or informal) that unreasonably restrict the functioning of the competitive system. Examples include agreements or communications between Lexmark and:

- a competitor to charge the same price for a product or to divide or allocate markets or customers;
- a supplier which limits or controls the supplier's production or prohibits the supplier from selling to a Lexmark competitor; or
- a distributor which prohibits the distributor from handling competitive products.

These and other agreements that could limit competition are highly questionable, if not illegal, and must be reviewed with Lexmark's Legal Department.

A formal agreement with a competitor need not exist to violate these laws. A general discussion followed by common action can be enough to show an implied agreement. In an investigation, every communication, written or oral, is subject to extreme scrutiny. You must not engage in any communication with a competitor that could result in price-fixing, bid-rigging (including complementary bidding), allocation of customers or markets, boycotts or production limits to restrain trade.

To ensure that Lexmark complies with these laws, all contracts, arrangements and questionable situations should be reviewed by Lexmark's Legal Department, except for standard contracts and practices already approved by Lexmark's Legal Department (such as standard sales and purchasing agreements and practices).

Bribes, Kickbacks or Other Corrupt Transactions

All employees, officers and directors of Lexmark or any of its affiliates, channel partners, service providers, suppliers, intermediary agents, joint ventures, or third parties acting as a representative, agent, or adviser to Lexmark or any of its affiliates, must comply fully with applicable anti-corruption laws, including applicable provisions of the Foreign Corrupt Practice Act.

You are prohibited under any circumstances from directly or indirectly offering, giving, soliciting or receiving any form of bribe, kickback or other corrupt payment, or anything of value to or from any person or organization ("corrupt transactions"), including government agencies, individual government officials, private companies and employees of those private companies except as provided for under the anti-corruption policy or this document.

The Foreign Corrupt Practices Act (the "FCPA") applies to U.S. individuals and companies, including their controlled international subsidiaries.

The FCPA anti-bribery provisions prohibit payment of a bribe to a foreign official. The FCPA defines a bribe as anything of value given or offered to a foreign official to influence an act or decision to obtain, retain or direct business or to secure any improper advantage. "Anything of value" is not limited to cash.

Foreign officials include: (i) a non-U.S. official or non-U.S. political party, party official or candidate for political office; (ii) an employee of a government-owned company, such as a national utility company; and (iii) an officer or employee of a public international organization, such as a United Nations agency.

The FCPA contains special provisions for expediting payments made to secure routine governmental action. No such payments may be made without the advance approval of Lexmark's Legal Department. Any such payments must be recorded as an expediting payment in the accounting records of Lexmark.

Any officer, director, employee, agent or stockholder acting on behalf of Lexmark who violates the FCPA may be subject to substantial fines and/or imprisonment, in addition to any Lexmark disciplinary action he or she may face. If convicted, Lexmark may also be subject to substantial fines.

Corrupt Transactions and Third-Party Relationships

Corrupt offers, promises and payments made through channel partners, service providers, intermediary agents, joint ventures, or third parties are also prohibited.

Therefore, it is important to conduct due diligence on such partners or agents, and not disregard or ignore facts which indicate a probability that a corrupt payment may occur. The purpose of due diligence is to ensure, to the extent possible, that Lexmark retains only reputable and honest agents, representatives and partners.

In addition, contracts with agents or third-party representatives and joint venture partners should, to the extent possible, include provisions to mitigate the risk of potential corrupt transactions.

Boycotts and Export Controls

Lexmark's and its non-U.S. subsidiaries' ability to export and sell products and services in certain countries and to certain entities is restricted by U.S. and other laws and regulations. In addition, Lexmark is prohibited from participating in boycotts against other countries which are considered friends of the United States. U.S. law requires that Lexmark report the receipt of any boycott requests to the U.S. Government. If you become aware of a boycott request, or have any question as to whether a proposed transaction may violate the export control laws, you should consult with Worldwide Import and Export Compliance or with local management responsible for export compliance.

Copyrightable Material

In most cases, the copyrights in employee-generated works of authorship, such as manuals and computer programs, are automatically owned by Lexmark through operation of law. In other cases, title to the copyrights is given to Lexmark by contractual provisions. Lexmark's policy is to limit the reproduction or distribution of copyrighted material within Lexmark to only that material for which the copyright is owned by or appropriately licensed to Lexmark. To ensure that material not owned by Lexmark is appropriately licensed, Lexmark may request a license from the owner of such material before permitting the material to be placed into or on any Lexmark owned distribution channel, including, but not limited to, any corporate e-mail or intranet system. If there is a question of ownership, you should consult your manager before you distribute material through any distribution channel.

CFIUS and United States Government Imposed Communication Restrictions

The Committee on Foreign Investment in the United States (CFIUS) is an inter-agency committee of the U.S. Government that reviews transactions that could result in control of a U.S. business by a foreign person or foreign company, to determine the effect of such transactions on the national security of the United States.

In November 2016, Lexmark was purchased by a consortium of Chinese based investors led by Apex Technology Co. (now Ninestar Corporation) and the private equity firms PAG Asia Capital and Legend Holdings.

As a result of this purchase, there are several very important, U.S. government-imposed rules about how Lexmark's employees and contingent workers may interact with consortium employees, contingent workers and affiliates. The U.S. government recognizes the synergies that can be achieved by allowing Lexmark and the consortium to work together on select projects. Unless your management team tells you that you will be working on one of these projects and you receive approval notification from Lexmark's Security Officer, you should not have any contact with anyone from the consortium or its affiliate companies.

The vast majority of our employees will have no interaction with members of the consortium, and while you need to understand these rules, they generally won't impact your day to day activities. For that handful of employees who will have interactions, you will need to understand the rules prior to any future interactions.

You should report to your manager and to the Lexmark Security Officer at security.officer@lexmark.com if anyone associated with the consortium attempts to contact you for any reason if you are not approved to engage with the consortium. Do not initiate or accept phone calls, meeting invitations, texts, emails, or instant messages (e.g. WeChat) to or from any person associated with the consortium companies unless you are working on an Approved Business Relation (ABR), are listed on Lexmark's Approved Communications List, and have completed specific training on the process and rules for communicating with members of the consortium. You should also report to your manager and to the Lexmark Security Officer if anyone associated with the consortium attempts to contact you outside of these policies and guidelines.

Supplier Relationships

You must treat all suppliers fairly. It is essential that suppliers competing for Lexmark's business have confidence in the integrity of our selection process. In deciding among competing suppliers, you should weigh all the facts impartially. Whether or not you are in a position to influence decisions involving the evaluation or selection of suppliers, you must not exert or attempt to exert influence to obtain special treatment on behalf of a particular supplier. Suppliers are to be selected in line with Lexmark's sourcing strategy and on the basis of a supplier's ability to satisfy Lexmark's requirements, which include quality, price, continuity of supply, capacity, reliability and technology.

To prevent any perception of unfairness, former employees will generally not be allowed to act as a supplier or supplier's representative for a period of one year after such person's employment with Lexmark has ended.

Suppliers should never be used as a means to circumvent Lexmark policy or the law.

Avoid Reciprocal Dealing

Seeking reciprocity is contrary to Lexmark policy and may be unlawful. You may not imply or tell a prospective supplier that your decision to purchase its products or services is conditioned on the supplier's agreement to purchase Lexmark products or services or on the supplier's not purchasing the products or services of a competitor (or actually imposing such a reciprocal obligation). To avoid allegations of reciprocal dealing, do not tell a prospective customer that Lexmark deserves the customer's business because Lexmark purchases products or services from that customer. This does not mean that a Lexmark customer is precluded from being a Lexmark supplier. It simply means that Lexmark's decision to buy products or services from a supplier must be made independently from that supplier's decision to purchase Lexmark products and services. Bartering arrangements are allowed only when approved by a member of Executive Management.

Lexmark extends appropriate terms to each type of customer. For example, distributors, dealers and end users purchase certain Lexmark products or services under different terms. However, within each category, Lexmark endeavors to conduct its business so that all customers who are procuring in similar quantities and under similar business conditions are treated in a similar manner.

Lexmark will compete vigorously in bidding for government and commercial business. If circumstances require modified pricing or service terms, the modifications must be specifically approved by an appropriate level of management.

Premature Disclosure

In most circumstances, Lexmark does not disclose unannounced offerings (including products, prices, terms and conditions) to a customer or prospective customer that have not been disclosed to customers generally. Exceptions must be approved by a member of Executive Management.

Truth in Advertising

It is Lexmark's policy to avoid any misstatement of fact or misleading impression in any of its advertising, literature, exhibits or other public statements. All statements made in support of our products and services should be true statements that can be supported to the satisfaction of a reasonable person. In addition, any omission of fact, wrongful emphasis or use of illustrative material that would tend to mislead a reader, listener or viewer is to be avoided. No claim, comparison or other statement of fact should be included in a message without having sufficient evidence to support it.

Commission for Referrals

When authorized by Lexmark, sales and marketing employees may refer customers to third-party suppliers such as Lexmark authorized remarketers, third-party software organizations or financing organizations. However, you may not accept any fee, commission or other compensation for this activity from anyone other than Lexmark.

Relationships with Government Customers

What is acceptable practice in a commercial business environment may not be acceptable (and may possibly be illegal) when dealing with government customers. Therefore, you must be aware of and adhere to the relevant laws and regulations in each country governing relationships between government customers and suppliers.

For example, the following activities (whether conducted directly or indirectly) are not permitted when dealing with U.S. Government customers and may be prohibited in other countries as well:

- discussing or offering employment or business opportunities which could personally benefit procurement officials;
- offering or providing gifts or gratuities; or
- soliciting or obtaining proprietary or source selection information.

Furthermore, Lexmark may be prohibited from hiring former government employees who participated personally and substantially on behalf of the government in procurement activities. You should consult with Lexmark management and the Lexmark Legal Department before you take any steps to hire such a person.

Competitor Relationships

Fairness in the Field

If you work in a sales or service activity, Lexmark expects you to compete vigorously and effectively, but most of all, fairly. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair-dealing practices.

Disparagement

It is Lexmark's policy to sell products and services on their merits, not by disparaging competitors, their products or services. False or misleading statements and innuendoes are improper. You may not make comparisons that unfairly cast the competitor in a bad light. Such conduct only invites disrespect from customers and complaints from competitors.

In short, in all your business dealings you should stress the advantages of Lexmark products and services and be sure that all comparisons are fair and accurate.

Business Contacts with Competitors

Because many companies have multiple relationships with Lexmark, you should be aware that a company with whom you are dealing, such as a supplier or a customer, may also be a Lexmark competitor. Such relationships require extra care. It is also inevitable that you, other Lexmark employees and competitors will from time to time meet, talk and attend the same industry or association meetings. Usually these contacts are perfectly acceptable as long as the requirements of this Code of Business Conduct are followed.

Acceptable contacts include sales to other companies in our industry, purchases from them, participation in approved joint bids, and attendance at business shows, standards organizations and trade associations. But even these contacts require caution.

In all contacts with competitors, you should not discuss pricing policy, terms and conditions, costs, inventories, research and development activities, marketing and product plans, market surveys and studies, production plans and capabilities, financial performance or any other proprietary or confidential information.

Collaboration or discussion of these subjects with competitors can be illegal. If a competitor raises such a subject, even lightly or with apparent innocence, you should object, stop the conversation immediately and tell the competitor that you cannot discuss these matters under any circumstances. If necessary, you should leave the meeting.

In summary, disassociate yourself and Lexmark from participation in any possibly illegal activity with competitors; and confine your communication to what is clearly legal and proper. Finally, report any incident associated with a prohibited subject to Lexmark's Legal Department as soon as possible.

Information Concerning Others

Data Protection

Lexmark is committed to following responsible personal data management and protection practices for all personal data collected from external sources, including customers, prospective customers, business partners and other third parties. Employees and those business partners and suppliers who manage and use such data on our behalf are required to do so in compliance with Lexmark's Privacy Policy and applicable law.

Acquiring Information

In the normal course of business, you may acquire information about many other organizations, including competitors. Doing so is a normal business activity. Lexmark gathers this kind of information for such purposes as extending credit and evaluating suppliers. Lexmark also collects information on competitors from a variety of legitimate sources to evaluate the relative merits of its own products, services and marketing methods.

There are, however, limits to the ways that information, especially information about competitors, may be acquired and used. You should not employ illegal or unethical means to acquire a competitor's trade secrets or other confidential information. Lexmark does not condone any illegal practices to acquire such information, including stealing, burglary, wiretapping and bribery. Solicitation of, or accepting confidential data from a competitor's employees, from Lexmark employees who were previously employed by competitors or from Lexmark customers is also prohibited. You may not misrepresent for whom you work or who you are to obtain competitive information or utilize others to undertake activities that would be unacceptable if pursued by you.

You should not examine information designated as confidential, such data about products or proposals prepared for customers, business partners, or suppliers unless access to this information is required to do your job.

Using Information

Information about other companies and their employees should be treated with sensitivity and discretion and not disclosed unless authorized or legally mandated. Other companies are rightly concerned about their reputations and the privacy of their employees. When using sensitive information, you should use it in the proper context and make it available only to other Lexmark employees with a legitimate business need to know. In presenting such information, you should disclose the identity of the organization or individuals only if necessary. If disclosure is not necessary, you should present the information in the aggregate or by some other means.

Information Owned by Others

Other organizations, like Lexmark, have intellectual property they want to protect as do individuals. Sometimes they are willing to disclose their confidential information for a particular purpose. If you receive another party's confidential information, it is important that you proceed with caution to avoid Lexmark being accused of misappropriating or misusing someone else's confidential information.

To avoid the risk of Lexmark being accused of misappropriating or misusing someone's confidential or proprietary information (whether written or oral), you should determine whether the information actually is confidential or has restrictions placed on its use. If written information is labeled *trade secret, confidential, proprietary, or restricted*, or if you have any other reason to believe that Lexmark may not be free to use or

disseminate the information without restrictions, review it with your manager or Lexmark's Legal Department and, if appropriate, ask the other party.

The same precaution applies to oral information. If, before entering into a meeting or a conversation, you think that the information you are about to hear might be considered confidential, you should first establish clearly in writing that it is not confidential and that its use is unrestricted.

You may not receive confidential information or information that has use restrictions (whether written or oral) without prior written approval by a member of Executive Management and Lexmark's Legal Department. Furthermore, the actual receipt of such information must not take place until the terms of its use have been formally agreed to in writing by Lexmark and the other party. Any such agreement should be reviewed by Lexmark's Legal Department. Once another party's confidential information is legitimately in your hands, you may not use, copy, distribute or disclose that information unless you do so in accordance with the terms of that agreement.

Corporate Social Responsibility

Lexmark is committed to acting responsibly in the global community. Consistent with this commitment, as a company and as individual Lexmark employees, we must strive to operate in a manner that demonstrates Lexmark's respect for human rights, safety standards and environmentally sound business practices.

Promoting Human Rights

Lexmark strives to assure the fair and equitable treatment of our employees and those of our suppliers by protecting workers' rights and promoting safe and ethical working conditions. As a Lexmark employee you have the right to freely-chosen employment and freedom of association. In this regard, Lexmark does not use forced labor, indentured labor, or child labor. Lexmark is committed to compliance with laws regulating wages, hours and working age.

Ensuring Product Safety

Lexmark Product Safety Programs focus on compliance with worldwide safety and health regulations and laws. As part of this commitment, Lexmark tests our products in laboratories accredited by third-party agencies. As part of these efforts Lexmark's Product Safety teams are tasked with investigating reported safety incidents and taking appropriate action.

Providing a Safe and Healthy Workplace

The health and safety of our employees is a priority. Lexmark offers workplaces that pursue the safe use of equipment, situations and practices and has developed written programs that focus on legal and regulatory compliance. Should an unsafe working condition or other safety issue occur, you have an obligation to promptly report it directly to your management or to your Environmental, Health and Safety team.

Protecting the Environment

Lexmark is committed to preserving and protecting our natural resources and practicing pollution prevention in the design of our products and services, and in the operation of our facilities. You are encouraged to discover effective and eco-friendly ways of helping our customers and safeguarding the environment. Your ideas and efforts should seek new ways to deploy cost-effective best practices for energy conservation, wise water use, and waste reduction through reuse and recycling.