

PSDA Code of Professional Conduct

Compliance with the Standards of Business Conduct

The Print Services & Distribution Association (PSDA) Code of Professional Conduct is a general guide to the association's standards of business practices and regulatory compliance. **All references to "associate" include directors, officers, and employees of the PSDA and any subsidiaries or affiliates.**

Failure to read and/or acknowledge the *PSDA Code of Professional Conduct* does not exempt an associate from his/her responsibility to comply with the *Code of Professional Conduct*, applicable laws, regulations, and all PSDA policies and guidelines that are related to his/her job.

PSDA is an international association, and our business operations are subject to the laws of many different states. Any PSDA associate doing business nationally must comply with all applicable laws and regulations and uphold the Code of Professional Conduct at all times. Cultural differences or local laws and customs may require a different interpretation of our Standards. If this situation arises, the PSDA Board should consult the President and the PSDA staff should consult the Executive Vice President.

The Code of professional Conduct is not intended to, and does not create an employment contract, and does not create any contractual rights between the PSDA and its associates or create any express or implied promise for specific treatment in specific situations.

Our Commitment: Integrity in All Our Interactions

Each day we interact with a variety of individuals and groups—including our members, partners, competitors, co-workers, vendors, government and regulatory agencies, and the communities in which we operate. We are committed to interacting with all of these audiences in a respectful, ethical manner and in full compliance with all regulatory requirements.

The PSDA Standards of Business Conduct

We manage our association in full compliance with all laws and regulatory requirements.

Regulatory Compliance: We are aware of and strictly obey the laws and regulations that govern the management of our association. We are responsible for understanding these laws and regulations as they apply to our jobs and for preventing, detecting, and reporting instances of non-compliance to a member of the PSDA's executive management. There are no circumstances at the PSDA that would allow us to disregard any law or regulatory requirement in the conduct of our association, and no such activity will be tolerated.

Lobbying: We recognize our right to lobby on behalf of issues that affect our association and the industry in general. If conducted, our lobbying activities will be in full compliance with the laws and regulations governing these activities.

Political Activities and Contributions: PSDA associates are encouraged to exercise their right to participate in political activities. Any decision to become involved is entirely personal and voluntary. Associates' political activities are done on their own time and with their own resources. We do not

represent ourselves as acting on behalf of and/or speaking for the PSDA without permission from the Executive Vice President.

Regulatory Investigations, Inspections, and Inquiries: We are direct, honest, and truthful in our discussions with regulatory agency representatives and government officials. During investigations, inspections, and inquiries we work with the PSDA Executive Vice President and cooperate by responding to appropriate requests for information provided that the proper documentation or request for documentation has been provided by the regulatory agency.

National Business Activities: The PSDA acknowledges and respects the diverse cultures, customs, and business practices it encounters in the national and international marketplace. The PSDA will comply with both the applicable U.S. and international laws and regulations that govern its operations and local laws wherever it does business.

Anti-Boycott Requirements: The PSDA complies with U.S. law that prohibits participation in international boycotts that are not sanctioned by the U.S. government.

We build and maintain the trust and respect of our members, partners, and fellow association peers.

Responsible Leadership: We manage our association responsibly in order to maintain the confidence, respect, and trust of our members, the industry, and other audiences. We are committed to acting with integrity, being responsive and accountable to our members and partners, and remaining a leader in our field.

Product and Service Quality: The PSDA's products and services are developed and managed to meet the expectations of our members and partners for high quality and exceptional service. We continually seek new ways to improve our products, service, and responsiveness.

Communication: We establish and maintain clear, honest, and open communications; listen carefully; and build our relationships on trust, respect, and mutual understanding. We are accountable and responsive to the needs of our members and partners and take our commitments to them seriously. Our advertising and promotional literature seeks to be truthful, accurate, and free from false claims. We provide our members with timely and appropriate information subject only to competitive and legal constraints.

Fair Information Practices: Our non-profit association business is built around providing information provided to us by our members, and we treat that information with confidentiality and integrity. We are committed to encouraging a trustworthy environment for Internet users. We have adopted privacy practices, employ technological solutions to help protect online privacy, and strive to educate members about how they can use these tools to manage their personally identifiable information while they use the Internet.

Vendors: PSDA vendors must adhere to the highest standards of ethical behavior and regulatory compliance and operate in the best interest of the PSDA and its members. Vendors are expected to provide high-quality services and products while maintaining flexibility and cost-effectiveness. All vendors can access and read the PSDA Code of Professional Conduct on our website and, when appropriate, train their employees and representatives to ensure that they are aware of the PSDA's expectations regarding their behavior. We do not engage in any unethical or illegal conduct with our vendors. We do not allow our associates to accept incentives such as kickbacks or bribes in return for conducting business with them.

We are responsible stewards in the use, protection, and management of the PSDA's assets.

Financial Integrity: We honestly and accurately record and report all business information. We comply with all local, state, and federal laws regarding record completion and accuracy. We require that all financial transactions are executed in accordance with management's authorization, and are recorded in a proper manner in order to maintain accountability for PSDA's assets. Our financial information reflects only actual transactions and is in compliance with PSDA's and other applicable accounting practices.

Use and Protection of Assets: We wisely use and protect the assets of the association, including property (both physical and intellectual), supplies, consumables, and equipment. We use these assets exclusively for PSDA's business purposes.

Fiscal Responsibility: PSDA's associates exercise good stewardship over and spend the association's funds in a responsible manner.

Use of Information Technology: Use of association-provided information technology and systems and access to its contents are authorized for legitimate PSDA business-related purposes. At all times, we should use good judgment and common sense; conduct ourselves ethically, lawfully, and professionally; and strictly follow all authorization protocols while accessing and using association-provided information technology and its contents. In using these association assets and systems, we do not create access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, nor do we send any false, derogatory, or malicious communications.

Intellectual Property: We comply with the laws and regulations that govern the rights to and protection of our own and others' copyrights, trademarks, patents, trade secrets, and other forms of intellectual property.

Creation, Retention, and Disposal of Records and Information Assets: We create, retain, and dispose of our business records and information assets, both written and electronic, as part of our normal course of business in full compliance with all PSDA policies and guidelines, and all regulatory and legal requirements.

Confidential and Proprietary Information: We respect our ethical and legal responsibilities to protect PSDA's confidential and proprietary non-public information and communicate it only as necessary to conduct PSDA business. We do not use this information for our personal advantage or for non-PSDA business use, and maintain this confidentiality even after our affiliation with PSDA no longer exists.

Third-Party Software: We use software and other content information only in accordance with their associated licenses and/or terms of use. We prohibit the making or using of copies of non-licensed copyrighted material, including software, documentation, graphics, photographs, clip art, animation, movie/video clips, sound, and music.

Conflicts of Interest: PSDA associates are expected to act at all times in the PSDA's best interests and to exercise sound judgment unclouded by personal interests or divided loyalties. Both in the performance of our duties for the PSDA and our outside activities, we seek to avoid the appearance of, as well as an actual, conflict of interest.

Gifts and Entertainment: PSDA's policy and practice encourage the use of good judgment, discretion, and moderation when giving or accepting gifts or entertainment in business settings. Gift giving and entertainment practices may vary in different cultures; however, any gifts and entertainment given or received must be in compliance with law, must not violate the giver and/or receiver's policies on the matter, and be consistent with local custom and practice. We do not solicit gifts, entertainment, or favors of any value on an individual basis from persons or firms with which the PSDA actually or potentially does business. Nor do we act in a manner that would place any associate, vendor, or potential vendor in a position where he/she may feel obligated to make a gift, provide entertainment, or provide personal favors to individual associates in order to do business or continue to do business with the PSDA.

Purchasing Decisions and Practices: In our purchasing decisions, negotiations, contract development, and contract administration we comply with the applicable laws and regulations that govern those relationships.

We promote a cooperative and productive work environment.

Openness, Honesty, and Respect: In our relationships with each other, we strive to be open, honest, and respectful in sharing our ideas and thoughts, and in receiving input.

Equal Employment Opportunity: The PSDA promotes a cooperative and productive work environment by supporting the cultural and ethnic diversity of its workforce and is committed to providing equal employment opportunity to all qualified employees and applicants. We do not unlawfully discriminate on the basis of race, color, sex, sexual orientation, religion, national origin, marital status, age, disability, or veteran status in any personnel practice, including recruitment, hiring, training, promotion, and discipline. We take allegations of harassment and unlawful discrimination seriously and address all such concerns that are raised regarding this policy.

Safety and Health: A safe and clean work environment is important to the well being of all PSDA employees. The PSDA complies with applicable safety and health regulations and appropriate practices.

We are responsible, caring members of the American community.

Citizenship and Community Service: We have a strong commitment to the improvement of society as well as the communities we serve and in which we operate. We encourage the support of charitable, civic, educational, and cultural causes by our employees. Our contributions could include volunteer associate and management time, and other forms of assistance.

Respect for the Environment: The PSDA respects the environment and protects our natural resources. We comply with all laws and regulations regarding the use and preservation of our land, air, and water