



Cimpress Code of Business Conduct

Contents

GOOD ETHICS ARE GOOD BUSINESS	4
> About Our Code	4
OUR RESPONSIBILITIES	5
> The Code Applies to All of Us	5
> Comply with Laws	5
> Unique Responsibility of Managers	5
ASKING QUESTIONS	6
> Where to Ask Questions or Raise Concerns	6
> Think Before You Act: Making Ethical Decisions	7
> No Retaliation	7
OUR PEOPLE	8
> Harassment-Free Work Environment	8
> Be Respectful of Others	8
> Workplace Safety	9
BUSINESS PRACTICES	10
> Avoid Conflicts of Interest	10
> Honest and Ethical Conduct and Fair Dealing	11
> Open and Fair Competition	11
> Data Privacy	12
> Gifts and Business Entertainment	13
> Anti-Bribery	14
> Using Social Media Responsibly	14
SOCIAL RESPONSIBILITY	15
> Protecting the Environment	15
> Human Rights	16
OUR INVESTORS	17
> Insider Trading	17
> Political Activities and Contributions	18
> Confidential Information	18
> Protection and Proper Use Cimpres Assets	19
> Maintaining Accurate Books and Records	20
> Concerns Regarding Financial Reporting Matters	20
> Dealings with Independent Auditors	21
ADMINISTRATION OF THE CODE	22
> Waivers	22
> Investigating and Resolving Issues Under the Code	22
> Amendments	23
SPEAK UP! CONFIDENTIAL REPORTING HELPLINE	24

Fellow Cimpres Team Members:

It is important to me to nourish and nurture our company culture. As I listen to people across Cimpres talk about how they want our culture to develop, I continually hear that they want to feel proud to work at Cimpres – through our products, our colleagues and the way we work together to serve millions of customers. One way we get there is never forgetting our commitment to operating with the highest ethical standards.

This Code covers a range of topics but it is rooted in one key philosophy: good ethics are good business. As we relentlessly strive to become a transformational and enduring business, I urge you to uphold the principles outlined in our Code and speak up in instances where we can continue to improve.

--Robert Keane, CEO



Good Ethics Are Good Business

Just as we empower our customers to make an impression, what we do and the choices we make can also make a lasting impression on our team members, customers, long-term investors, communities and our brand.

> About Our Code

This Code of Business Conduct is central to how we conduct business and is the foundational document of our entire corporate compliance program. It sets forth our commitment to doing business not only legally, but also with the highest standards of ethics and integrity. This Code is at the center of our efforts to ensure that each one of us can make the right choices in our roles. Please review it carefully and refer back to it anytime you encounter a situation covered by this Code.



OUR RESPONSIBILITIES

> The Code Applies to All of Us

This Code applies to every team member who works for Cimpres, whether remotely or in person, including at any of our majority-owned businesses anywhere in the world. It also applies to all officers, directors, contractors, temporary employees, and interns of Cimpres and its businesses.



This document is not an employment contract between Cimpres or any of its employees, officers, directors, temporary employees, interns, contractors, or agents, and it does not in any way guarantee employment to any of them.

> Comply with Laws

First and foremost, we expect all of our team members to comply with all laws, rules and regulations applicable to us wherever Cimpres does business. This is not only the right thing to do, but it also avoids problems that could disrupt our business or damage our reputation. Always use good judgment and common sense and ask for advice if you are ever uncertain about what to do.

> Unique Responsibility of Managers

Managers have a special responsibility to set an example for others by:

- Promoting our ethical culture and demonstrating exemplary behavior
- Serving as a sounding board for others who might be experiencing an ethical dilemma or facing a difficult decision, and
- Creating an environment in which team members feel comfortable speaking up, asking questions or reporting concerns.



Companies who encourage team members to speak up tend to have a healthier culture and more engaged workforce.

ASKING QUESTIONS

> Where to Ask Questions or Raise Concerns

We want to hear from you about any:

- Guidance you need about a particular legal or ethical dilemma
- Questions you have about our policies
- Concerns you have about questionable behavior
- Violations or potential violations of this Code or the law

Each one of us has an obligation to report observed or suspected non-compliance with laws or company policies. When we ask questions or report concerns, we not only improve the company's ability to correct potential problems before they escalate, but we also shed light on potential opportunities to improve and clarify our policies, communications or trainings.

There are a number of places you can go for direction about, or to discuss, any of these matters, including:

- Your manager
- Your local HR or HR business partner
- Our compliance email box (Compliance@cimpres.com)
- Matt Walsh, Senior Vice President and General Counsel, +1.617.869.1399 or mwalsh@cimpres.com.
- Any member of your legal department or the Cimpres legal team
- The Speak Up! Confidential Reporting Helpline. Our confidential helpline is operated by an independent third party. The website is the same for all locations (SpeakUp.Cimpres.com). You can submit your report online or by phone. Each country has its own toll-free number, which can be found on the landing page by scrolling to "Call Us" and clicking on the drop-down menu "Select your location." You can identify yourself or remain anonymous (where anonymity is permitted by local law) using either of these methods. If you identify yourself when asking a question or reporting a concern, it might help us conduct a more effective and thorough investigation into the issue you are reporting.



Matthew Walsh
Senior Vice President and
General Counsel

Q

What does “good faith report” mean?

A

It means that if you are truthful about the facts that led you to be concerned, genuinely believe that there is some sort of wrongdoing, and report the facts to the best of your knowledge, then it does not matter whether an actual violation occurred. It is not unusual for an investigation to reveal that no violation occurred. Sometimes people are not aware of other relevant facts or misunderstand the applicable policy or procedure. We want you to speak up if you have a concern, let someone look into the issue, and feel comfortable that retaliation for making a good faith report is never tolerated.

> Think Before You Act: Making Ethical Decisions

This Code cannot address every situation we might encounter as we do our jobs. In such a case, we should ask ourselves:

- Is it legal?
- Does it feel like the right thing to do?
- Would I feel comfortable if my friends or family found out about it or if it was reported in the newspaper?
- Would it reflect positively on our company’s reputation?

If the answer to all of these questions is yes, then proceed with confidence. If the answer to any one of these questions is “no” or you are unsure, seek guidance using the contacts listed in the section above and ask additional questions.

> No Retaliation

We have a strict no retaliation policy for any reports made in good faith. This means no person will be disciplined or discriminated against in any way for reporting a concern in good faith or for cooperating in an investigation. Anyone who retaliates against a team member who makes a good faith report will be subject to discipline and possibly termination. While we prefer to resolve matters internally when possible, nothing should discourage you from reporting any illegal activity or violation of law to the appropriate governmental authority.



Q

I used to have a personal relationship with a co-worker but we broke up a month ago. Today they tried to kiss me like they did when we were dating, but this time I told them to stop and they wouldn't. Is this harassment if it is exactly what we used to do before we broke up?

A

Yes. Their behavior, or any unwanted sexual behavior, becomes harassment the moment you say "no" and that behavior does not stop. You should alert your manager, HR, the legal department, or contact the Speak Up! Confidential Reporting Helpline.

OUR PEOPLE

Maintaining a positive and inspiring work environment is critical to our success. It not only fosters a comfortable and open atmosphere for creative thinking and innovation, but it also enriches our interactions with each other and makes Cimpress a fun place to work.

> Harassment-Free Work Environment

At Cimpress, we make recruiting, retention, and other decisions related to performance management solely on the basis of merit and other organizational needs and considerations, such as an individual's ability to do their job with excellence and in alignment with the company's strategic and operational objectives. We prohibit discrimination on the basis of a person's actual or perceived race, color, sex, national or ethnic origin, nationality, ancestry, age, religion, creed, citizenship, physical or mental disability, medical condition, genetic information, sexual orientation, gender identity, gender presentation, legal or preferred name, political views, marital or domestic partnership status, pregnancy (including lactation and related medical conditions), family structure, military veteran status or any other basis protected by civil rights laws or regulations. This list is not exhaustive and in many cases we strive to do more than the law requires.

> Be Respectful of Others

We are committed to a work environment where team members are treated with respect and fairness. We value individual differences, unique perspectives and the distinct contributions that each one of us can make to the company. We should each act professionally in all job-related activities. We do not tolerate verbal or physical threats, abuse, behavior that is intimidating, hostile, offensive or humiliating or any acts of violence. We expect everyone to be respectful in communications with others, including electronic and online communications such as email, texting, instant messaging, online chats, blogs and posts on social networking sites. We have a separate Workplace Harassment Prevention Policy and a Workplace Violence Prevention Policy, which can be found at SpeakUp.Cimpress.com and on Confluence or Nexus, or you can request copies from your manager or local HR.



Q

When I got to work this morning, there was a person I had never seen before saying they had forgotten their badge at home and could I let them in. It feels rude to say “no.” What should I do?

A

Tell them that, as they know, every employee must have their badge to access the building. This is critical to maintaining the safety of our workplace. Say that you will be happy to take them to the reception area so they can be checked in and given a temporary badge or visitor's pass. If they do not agree to this, don't let them in the building and call building security.

> Workplace Safety

Our team members are our most valuable asset, and we are committed to providing a safe, healthy and secure work environment for every one of our team members. As an example of this commitment, we require training on and compliance with safe work practices and procedures at all of our manufacturing facilities to ensure the safety of our team members and visitors to our plant floors. We do not tolerate unsafe conditions that may endanger our team members or other parties, and we will comply with all health and safety laws and regulations.



Q

I'm making a filing with a local tax office and have been told by the official working at the tax office that our submission can be expedited if we pay him a supplemental fee or "toll." Can I pay the fee? Would it make a difference if our tax consultant was making the payment on our behalf?

A

You should not make this payment unless the tax official can point you to a published fee for this service, the payment goes to the tax office rather than to the individual, and the payment is not in cash and is properly documented. If the payment is improper, it makes no difference if you make the payment directly or use a consultant to make the payment. The use of a third party does not shield you from getting into trouble.

OUR BUSINESS PRACTICES

Our team members and customers put their trust in us to do the right thing, and it is our responsibility to prove to them that we are worthy of that trust. It is important that our business practices reflect our commitment to ethics and integrity.

> Avoiding Conflicts of Interest

A "conflict of interest" occurs when your personal or family interest interferes, or appears to interfere, with the interests of the company. A conflict of interest can arise whenever we take an action or have an interest that prevents us from performing our job responsibilities honestly, objectively and effectively. When faced with activity that presents a potential conflict of interest, it is important to put the company's interests before your personal interests.

Here are some examples of how you can avoid conflicts of interest:

- Avoid situations where your business judgment could be improperly influenced by close personal or family relationships.
- Devote your best efforts to the company and do not permit outside jobs or other activities to interfere with your job performance or responsibilities. Your primary work responsibilities are to the company, and your primary work hours, regardless of when they occur, should benefit Cimpres.
- Ensure your personal activities or investment decisions do not create conflicts with the company's business relationships.
- Never take for yourself an opportunity that you learn about through work when that opportunity belongs to the company or in instances when the company might have an interest (such as an investment opportunity).
- Avoid entering into business relationships on behalf of the company with any third party with whom you or anyone you know has a personal relationship.



Q

My manager is traveling. I received a phone call from my manager's spouse letting me know that my manager had lost their cell phone and needed some confidential files right away. The spouse asked me to send the information to their personal email address because my manager can't get their work email without their phone. It's okay to help my manager by sending business records to their spouse, right?

A

No. It is not okay to forward confidential work-related information or documents to your manager's spouse. Also, are you sure you were talking to your manager's spouse? This could be a social engineering scam to get you to send confidential information to a third party. If you suspect this was a phishing attempt, report it to Security@Cimpress.com so they can investigate.

When in doubt, ask: Am I doing what's right for the company? If still in doubt, ask your manager, your legal department or Cimpress legal for help. It is better to err on the side of caution by avoiding situations that even appear to present a conflict of interest.

> Honest and Ethical Conduct and Fair Dealing

It is our intention to create a business environment that reflects the highest standards of professionalism and ethical behavior. We must all endeavor to deal honestly, ethically and fairly with our suppliers, customers, competitors and other team members. Statements we make about our products and services must always be truthful, accurate and not misleading. We must not take unfair advantage of anyone through manipulation, abuse of confidential information, fraud or any other unfair practice. This is critical to preserving our good reputation.

> Open and Fair Competition

We strive to outperform our competitors fairly and never through unethical business practices. We do not collaborate with our competitors to restrain competition or trade by engaging in activities like:

- Agreeing to establish or maintain prices
- Dividing up markets, territories or customers
- Discussing the boycotting of a third party

If a competitor discusses any of these topics, no matter how casually, it is important to stop the conversation and report the incident to your manager, your legal department or Cimpress legal.



> Data Privacy

We respect the privacy of every team member and customer and understand the importance of protecting their personal information. Our team members and customers demonstrate their trust in us when they share their personal information with us, and protecting that information is critical to maintaining that trust. We do this by handling personal data with the utmost care and in compliance with privacy laws and company policy. It is critical that we get this right, not only because of the possibility of legal exposure, but also because it is the right thing to do for our customers. The Cimpres Security & Privacy team is committed to protecting the personal data we handle. We conduct frequent company-wide awareness campaigns on common data privacy risks to be vigilant about, such as phishing expeditions and spoofing attempts. We also have a global Information Security and Acceptable Use Policy that we conduct training on each year, which can be found in the Global Policy Resource Center on Nexus. You can also ask your manager or email Security@cimpres.com to request a copy.

We take our obligation to protect the privacy and confidentiality of our team members' personal, medical and financial information very seriously. This means collecting, storing, using and sharing personal information only as appropriate and as permitted by law. Never share a colleague's personal information with anyone inside or outside the company who does not have a legitimate business need to know, unless you are required to do so by law. Treat your colleagues' personal data with as much care and respect as you treat your own personal data.



> Gifts and Business Entertainment

Q

A vendor has offered to fly me to their offices so I can demo some of the products and materials we are considering purchasing. Is it okay if I let the vendor pay for my trip?

A

If you fly economy class, stay in a modest hotel and limit the trip to that business purpose, then yes, it is okay to accept the trip. But if the vendor wants to treat you to lavish entertainment during your trip with hopes that this will sway your decision to give them the business, you must refuse. You can point the vendor to our Gifts, Entertainment and Anti-Bribery Policy.

We value professional objectivity in our business relationships. Our guiding principle is that we do not receive or give any gift if it is intended to influence our business decision or another party's business decision.

We must not accept, or permit any member of our immediate family to accept, any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with the company, other than items of insignificant value (less than USD\$100 or the local equivalent). Any gifts of more than insignificant value or that are intended to influence any business decision should be returned immediately. If immediate return is not practical, the gift should be given to the company for charitable donation or another appropriate disposition. Gifts of cash are not acceptable under any circumstances, regardless of the amount, and gift cards are considered cash.

Common sense and moderation should prevail in business entertainment as well. Only provide or accept business entertainment to or from anyone doing business, or seeking to do business, with the company if the entertainment is infrequent, modest and intended to serve legitimate business goals. We have a separate Gifts, Entertainment and Anti-Bribery Policy, which can be accessed at SpeakUp.Cimpress.com, on Confluence and on Nexus. You can also ask your manager or email Compliance@cimpress.com to request a copy.



> Anti-Bribery

At Cimpress, we do not offer or accept anything of value that is intended to improperly influence a business decision. This includes bribes, kickbacks, facilitation payments or fraud. Business practices like these can not only harm our company and our reputation, but they also impede the development of vibrant economies around the world. Most governments are taking aggressive steps to combat corruption, and we are committed to doing our part as a global corporate citizen to assist with this effort.

While we do not permit bribery in any commercial arrangement, it is important to note that there is a heightened risk and scrutiny applied to dealings with government officials. Some countries (including the United States) have additional rules about giving anything of value to a government official, which can include government agencies and companies that are owned or controlled by the government (such as public utilities or certain telecommunications companies or news agencies). Any payment made to government officials and commercial partners must be for reasonable and properly documented business expenses and cannot be for the purpose of securing an improper business advantage.

We have a separate Gifts, Entertainment and Anti-Bribery Policy, which can be accessed at SpeakUp.Cimpress.com, on Confluence and on Nexus. You can also ask your manager or email Compliance@cimpress.com to request a copy.

> Using Social Media Responsibly

We have many strong brands at Cimpress, but we need your help in protecting those brands and our company reputation. Everything we say on social media can affect the image and reputation of the company. Do not disclose material, non-public information about the company or its business in any online forum, such as social media outlets, bulletin boards, chat rooms or blogs. This is true even if the intent is to correct inaccurate statements or defend the company. This kind of communication may result in the inadvertent release of proprietary or confidential information. We have a separate Social Media and External Communications Policy, which can be accessed at SpeakUp.Cimpress.com, on Confluence and on Nexus. You can also ask your manager or email Compliance@cimpress.com to request a copy.



Q

How do we seek to ensure our suppliers do not engage in human rights abuses?

A

In seeking to ensure that our supply chain is free from human trafficking and modern slavery, our global procurement organization has implemented an interconnected series of processes including asking our suppliers to review and sign our Supplier Code of Conduct. Similarly, each of our operating units seeks to ensure their supply chain does not allow for unacceptable practices such as child labor, slavery, and unsafe working conditions.

SOCIAL RESPONSIBILITY

All parts of Cimpres should conduct their business in a socially responsible, ethical manner that makes their team members proud. We do not centrally define what that means but we expect you to “know it when you see it”.

> Protecting the Environment

We strive to conduct business in an environmentally responsible manner and in a way that minimizes our impact on the environment. This means not only complying with all environmental laws and regulations, but also continually assessing and improving our processes in order to advance our environmental stewardship.

Cimpres has recently announced a series of ambitious sustainability goals that will shape the way we do business in both the near and long term. First, Cimpres will achieve “Net Zero” carbon emissions by 2040 (similar to “carbon neutrality,” but with a longer-term focus). This means that our operations, including our supply chain, will systematically and consistently decarbonize in the coming years until zero emissions are reached (with carbon offsets only being used as a last resort to address residual emissions in the final years leading up to 2040, if at all). To achieve this tremendous goal, we will follow a decarbonization pathway that slightly exceeds the 1.5°C target pathway agreed to in the 2015 United Nations Global Compact (aka “The Paris Agreement”), ensuring that dramatic reductions are occurring both now and in the future.

It is also important that Cimpres’ operations do not contribute to deforestation. For this reason, Cimpres has committed to using responsibly forested materials in both our packaging and products through a series of FY25 targets. By FY25, we will have converted 100% of the wood-fibre-based products customized in our facilities to FSC-certified material (<https://fsc.org/>) and will drive our third-party fulfillers to reach 95% conversion, as well. In addition, 95% of the wood-fibre-based packaging used in our plants will come from either FSC-certified sources or contain high levels of post-consumer waste content.

Finally, plastic products and packaging play a significant role in Cimpres's portfolio and can lead to significant environmental damage if we are not mindful of the choices we make with these materials. We are committed to completely eliminating the most problematic plastics (polystyrene and PVC) from our products and packaging by FY25. For those plastics that remain, we will work to ensure that they are recyclable, reusable, compostable, or returnable to a Cimpres business and contain higher levels of recycled content whenever possible.

> Human Rights

At Cimpres, we recognize that we are a global corporate citizen with a responsibility to set an example in our business dealings with others. We do not use forced, involuntary or child labor in any of our facilities or permit its use in any part of our supply chain. We have a separate Supplier Code of Conduct that we ask our suppliers to abide by. Our Supplier Code of Conduct can be found at SpeakUp.Cimpres.com and on our Cimpres.com website.



Q

How do I know if certain information is considered “material”?

A

If the information would cause a reasonable investor to want to buy or sell a company’s stock, then it is “material.” Ask yourself, “Does this information make me want to buy or sell this company’s stock?” If the answer is yes, you are likely in possession of material information and you should avoid making a trade until that information is made public.

OUR INVESTORS

We have a responsibility to make financial decisions in accordance with the financial goals that our investor relations team and senior executives communicate to investors, as well as the budgets that we establish internally. We state clearly that our uppermost financial objective is to maximize the intrinsic value per share of Cimpres, and we regularly communicate our investment philosophies, assessments and plans both internally and externally. Each investor can then decide to invest, divest or hold our shares based on their own judgment and investing philosophies. We must do all we can to protect our reputation as an honest and trustworthy company.

> Insider Trading

In the course of our jobs, we could have access to material information about Cimpres that is not known to the public, like financial results, the potential acquisition of a business, or specific technology achievements. We might also have access to material information about other companies, like our suppliers, customers and competitors. Until this information is disclosed to the public:

- Do not buy or sell the stock of Cimpres or those other companies.
- Do not communicate that information to others who might trade on the basis of that information.

To guard against insider trading, each quarter the finance or legal teams at each of our businesses notify team members who might be aware of material non-public information that they are subject to a regular blackout period beginning two weeks before the end of our fiscal quarter and ending at the end of the second full trading day after Cimpres publicly announces its earnings for the quarter.

We have a separate Insider Trading Policy, which can be accessed at SpeakUp.Cimpres.com, on Confluence and on Nexus. You can also ask your manager or email Compliance@cimpres.com to request a copy. If you are uncertain about whether you are prohibited from buying or selling Cimpres stock or the stock of any other company that you are familiar with by virtue of your relationship with Cimpres, please consult with the Cimpres legal department before making that purchase or sale.



Q

My team just completed our highest revenue generating quarter. My location has digital signage. What a terrific way to let everybody know how great we're doing!

A

Not exactly. The digital signage is visible to Cimpres team members, as well as visitors. Revenue numbers are confidential until disclosed through the appropriate channels in our public filings. Congratulations to your team, but you will need to keep the information confidential until it has been publicly disclosed.

> Political Activities and Contributions

We should each feel free to engage in political activities with our personal time and money. But it is important not to engage in any political activity using company time or resources. Make it clear that your views and actions are your own and not those of the company. Also, do not make any payments using corporate funds, or in the company's name, to any political party, candidate, or campaign.

> Confidential Information

Confidential information is any non-public or proprietary information related to or held by the company. This includes many things that are valuable company assets, such as:

- Strategic plans
- Information concerning an acquisition or investment in another company, strategic partnerships or contracts
- Unpatented inventions, ideas, methods and discoveries
- Trade secrets, know-how and other confidential intellectual property, including unpublished patent applications
- All non-public financial information such as revenue levels, profits and financial or pricing information
- Information related to product launches and yields, designs, efficiencies and capacities of our production facilities, methods and systems
- Team member, customer and vendor lists
- Source code (excluding open source works) or object code
- Any material, non-public information

It is critical to our continued growth and competitiveness that this information remain confidential and secure. Do not disclose this information to people or companies outside Cimpres, unless there is a specific business purpose and a non-disclosure agreement is in place, or we are required by law to disclose it. It is also important to respect our commitment to protect the confidential information of other companies, including our suppliers and customers.

Third parties might ask you for information about Cimpres. These third parties might include media or securities market professionals (like securities analysts, institutional investors, brokers and dealers). If you receive any inquiries of this nature, you should decline to comment and refer the person to the Cimpres Communications or Investor Relations teams.



Q

I'm putting together a PowerPoint presentation and need a picture of a cute dog. I used Google and found a great photo on the Internet. I can use it, right?

A

Just because something is online doesn't mean you have permission to use it. Contact the copyright owner to receive approval to use the image. The same considerations apply if you wish to use a song or audio file in a presentation.

All of us must also abide by any obligations that we have to our former employers. These obligations may include restrictions on the use and disclosure of their confidential information, restrictions on the solicitation of our former colleagues to come work at Cimpress, and non-competition obligations.

> Protection and Proper Use of Cimpress Assets

Protecting company assets is crucial. These assets include equipment, tools, materials, supplies, and technology resources (such as computers, phones and mobile devices), as well as intangible assets like trademarks, copyrights and patents. Respect the intangible assets of others, and if you see a violation of our intangible property rights, notify your legal or finance department. Theft, loss, carelessness and waste have a direct impact on our financial performance. Use company assets for legitimate business purposes and not for any personal benefit or the personal benefit of anyone else. Failure to protect our technology resources can also make our electronic records vulnerable to attack by hackers. We have a separate Information Security and Acceptable Use Policy, which can be found on Nexus or by emailing Security@cimpress.com to request a copy.



Q

The Cimpress Internal Audit team is doing a site visit, and I'm nervous because I know we made an error in some of our documentation. Will they even know if I don't volunteer to point out the mistake – do I need to?

A

Following decentralization, communication and transparency are more important than ever. If you know there is an error, tell Internal Audit. The purpose is not to assign blame, and you won't get in trouble for communicating or being transparent with Internal Audit. Internal Audit will want to verify information and help remediate the problem. They can help you develop a better process or provide context around why it is important for documentation to be properly maintained.

> Maintaining Accurate Books and Records

Honestly and accurately reporting all business transactions is key to running an ethical business. Each of us is responsible for the accuracy of our records and reports. Accurate information is essential to our ability to make responsible business decisions and meet legal and regulatory obligations.

All company books, records and accounts must be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. Our financial statements must conform to generally accepted accounting principles and Cimpress' accounting policies. No undisclosed or unrecorded account or fund can be established for any purpose. No false or misleading entries can be made in our books or records for any reason, and no disbursement of corporate funds or other corporate property can be made without adequate supporting documentation.

Cimpress has a legal obligation to provide full, fair, accurate, timely and understandable disclosure in reports and documents submitted to the United States Securities and Exchange Commission and in other public communications. Our statutory accounts and filings must be in accordance with requirements applicable to the jurisdictions in which our subsidiaries operate.

> Concerns Regarding Financial Reporting Matters

If you have concerns regarding potential fraud, questionable accounting or financial reporting matters, or complaints regarding accounting, internal accounting controls or auditing matters, report the matter to your manager, the finance or legal departments, or to the Speak Up! Confidential Reporting Helpline at SpeakUp.Cimpress.com. Any such concerns or complaints may also be communicated directly to the Chair of the Audit Committee of the Board of Directors, Cimpress plc, First Floor Building 3, Finnabair Business and Technology Park, Dundalk, Co. Louth, Ireland.

We will not discipline, discriminate against or retaliate against any team member who reports a complaint or concern in good faith.



> Dealings with Auditors

We participate in many kinds of audits at Cimpress, and it is essential to our success that we cooperate with our auditors. Never make any false or misleading statement or omission to an accountant (internal or external) in connection with any audit, review or examination of Cimpress' financial statements or the preparation or filing of any document or report with the United States Securities and Exchange Commission or other governmental agency. It is important not to take any action to coerce, manipulate, mislead or fraudulently influence any accountant engaged in the performance of an audit or review of our financial statements. The same applies to a qualified security assessor conducting a PCI evaluation or any other information security audits.



ADMINISTRATION OF THE CODE

> Waivers



While most of the policies contained in this Code must be strictly adhered to, in very rare cases exceptions may be appropriate. Any team member who believes that an exception to any of these policies is appropriate in their case must obtain the prior approval of the Cimpress legal department.

> Investigating and Resolving Issues Under the Code

We are committed to thoroughly investigating reports of potential violations of the Code. If we receive information regarding an alleged violation of this Code, we will:

- Evaluate the information
- Determine whether the report involves behavior that is suitable for an informal inquiry or a formal investigation and, if so, initiate that inquiry or investigation
- Determine whether disciplinary measures should be taken
- Where appropriate, report the results of the inquiry or investigation to the Board of Directors or a committee of the Board



We are all expected to cooperate fully with any inquiry or investigation regarding an alleged violation of this Code. Failure to cooperate with any inquiry or investigation may result in disciplinary action, up to and including termination.

Violation of this Code may result in potential legal liability to Cimpress or cause serious damage to our reputation. Failure to comply with the standards outlined in this Code may result in disciplinary action, up to and including termination.

Certain violations of this Code may require Cimpress to refer the matter to appropriate governmental or regulatory authorities for investigation or prosecution. Any manager who directs or approves of any conduct in violation of this Code also will be subject to disciplinary action, up to and including termination.

> Amendments

We strive for continuous improvement in all aspects of our ethics and compliance program. As a result, Cimpres may amend this Code from time to time. The most current version of this Code can be accessed at SpeakUp.cimpres.com, and on Confluence, Nexus and www.cimpres.com.

Revised: April 2023





When to Contact the Speak Up! Confidential Reporting Helpline

You can reach out to the Compliance Team with questions or concerns about any of our policies, a particular legal or ethical dilemma you are facing, or violations or potential violations of our Code of Business Conduct, any of our other policies or the law.

Cimpress has a strict no retaliation policy – you will not be disciplined for reports made in good faith, even if it turns out your report cannot be verified.

How the Speak Up! Confidential Reporting Helpline Works

Once you submit a report, the third-party vendor for our Speak Up! Confidential Reporting Helpline will notify the Compliance Team, who will then determine appropriate next steps. If you include your contact information when submitting a report, the vendor will reach out to you directly if the Compliance Team has further questions. Otherwise, you will need to log back into the portal using the password you set up to see whether additional information is requested.

How to Contact the Helpline

The website is the same for all locations (**SpeakUp.Cimpress.com**). You can submit your report online or by phone. Each country has its own toll-free number, which can be found on the landing page at SpeakUp.Cimpress.com by scrolling to "Call Us" and clicking on the drop-down menu "Select your location."

If you are unable to access SpeakUp.cimpress.com, we suggest clearing your cookies and trying again.

