



# Code of Conduct

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## Dear PFL Family:

Twenty years ago, PFL was born from a chat between two friends while fly-fishing on the Yellowstone River. Starting as a local print shop, we took our small-town values to the internet and became the first e-commerce printer. By putting those same core values into action every day, PFL continues to strengthen our reputation as a leader in innovation, customer success and uncompromised excellence through integrity.

The PFL Code outlines our set of core values and guiding principles for demonstrating the highest regard for ethics and integrity in all our business activities. While no single document can anticipate every situation, the PFL Code provides guidance on appropriate and ethical business conduct and can be summarized as follows: use good judgment at all times, be considerate of your co-workers, and consult your manager when in doubt as to the proper course of action.

Our collective reputation and success depend on the personal commitment each of us makes to uphold the standards of conduct in the PFL Code.

Thank you for your continued commitment.

Andrew S. Field  
Chief Executive Officer

# OUR CULTURE

## PFL Mission

- To build a healthy, growing company that rewards our employees, community, and investors;
- By helping our customers and partners to be successful, as they define it;
- While having a lot of fun.

## PFL Core Values

At PFL, we believe in a culture that empowers our employees to contribute, innovate and succeed. The keys to demonstrating and nurturing this strong organizational culture are PFL's core values. These core values must guide the words and actions of each of us at PFL:

- Continuous Improvement
- A Great Place to Work: Fun-loving and Accountable
- Serve our Customers and be ETDBW
- Teamwork and Transparency
- Buoyant, Indomitable Optimism
- We aren't a political, back-stabbing, gossipy snake pit

## PFL Employees

PFL is an equal opportunity employer and all employment decisions are based on merit and business need. PFL prohibits discrimination against employees or job applicants based on certain individual characteristics or any other factor protected by law.

Consistent with our core values, our employees are encouraged to communicate respectfully, openly and honestly with one another including supervisors and management. PFL respects, encourages and welcomes employee's opinions, thoughts and concerns in our continual effort to be simply the best.

## Standards of Conduct

PFL is committed to operating legally, safely and effectively by complying with all applicable laws and regulations of the jurisdictions in which we operate or conduct business. Fundamental to this commitment is PFL's overall standard of business conduct: "*excellence through integrity.*"

PFL's has policies that provide employees a guide for standards of business conduct among legal issues, regulatory requirements, business risks and individual responsibilities. The following PFL Corporate Policies are annually reviewed by Senior Leadership and endorsed by the Board of Directors.

## OUR CORPORATE POLICIES

### Anti-Corruption

Your responsibility to act ethically and honestly in all business interactions extends to legal and regulatory requirements. A high-risk area for all businesses, including PFL and our Customers, is corruption at any level. It is never acceptable to offer or accept a bribe or anything of value in return for an unfair business advantage. Please refer to the **PFL Anti-Bribery and Anti-Corruption Policy** for our comprehensive policy detailing PFL rules regarding gifts and entertainment, facilitation payments, third parties, public officials, and employee escalation.

### Anti-Harassment

All employees are expected to be sensitive to, and respectful of, the individual rights and personal beliefs of your PFL team members.

We will not tolerate harassment of any kind or any conduct, verbal or physical, that may create or contribute to a hostile work environment. For more information on PFL's anti-harassment policies and procedures, please refer to the **PFL Policy and Benefits Manual**.

### Conflict of Interest

A conflict of interest can occur whenever you have a personal interest that may interfere with your ability to make decisions in the best interest of PFL. Your obligation as a PFL employee is to proactively avoid situations that can lead to even the appearance of a conflict of interest. If you find yourself in a potential conflict of interest situation, please notify the Human Resources Department or your manager. Depending on the circumstances, we may be able to work with you to resolve conflicts when they are disclosed and handled properly. Please refer to the **Conflicts of Interest Policy** for additional information.

### Information Security and Assets

PFL-owned technology, devices and systems, including computers, telephones, e-mail, Internet access and voice mail, are intended for business use. As such, all content created, stored or transferred is the property of PFL. All measures to protect the security and confidentiality of information systems, applications, networks and business data are outlined in the **PFL Corporate Information Security Policy**.

Please refer to the **PFL Employee Acceptable Use Policy** for a comprehensive list of your responsibilities as a PFL employee regarding appropriate use of technology, devices and system resources.

PFL supports its people having a healthy work/life balance, including disconnecting from work when they leave the workplace. Some people prefer the convenience of using their personal electronic devices, such as smartphones and tablets, to allow them off-premise access to their PFL

email. Mobile devices, however, also represent a significant risk to company information security and data protection if appropriate security applications and procedures are not applied. Please refer to the **PFL Mobile Device Policy** for a comprehensive set of requirements for the safe use of personal mobile devices when accessing company-owned systems and applications.

## Social Media Policy

At PFL, we understand social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers. Before creating online content, consider the risks and rewards that are involved. Inappropriate postings that include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated. Keep in mind online conduct that adversely affects your job performance, the performance of coworkers or otherwise adversely affects PFL's legitimate business interests may result in disciplinary action up to and including termination. Please refer to the **PFL Policy and Benefits Manual**.

## Records and Information Management

Proper records management is an important matter for PFL. The failure to manage records according to the **PFL Records and Information Management Policy and Schedule** could have serious business and legal consequences. Use common sense and observe standards of good taste regarding content and language when creating business records and other documents, including email, that may be retained by PFL or third parties.

## ENFORCEMENT

Our employees have a responsibility to bring violations or suspected violations of the PFL Code to an appropriate party. You may report such violations to your supervisor, Human Resources, or Compliance. Please refer to the **PFL Compliance Reporting Policy** for additional information.

Employees who report wrongdoing in good faith will not suffer punishment or retaliation. However, any attempt to misuse the provisions of this Code to wrongfully and intentionally harm a person by making false accusations or engaging in other improper conduct will result in disciplinary action, including possible termination of employment.

## Executive Order

PFL's Code of Conduct is managed by the Compliance Committee which reports directly to the Board of Directors. In administering the Code, the Compliance Committee works closely with key stakeholders and all other functional groups focused on ensuring compliance.