

# Printcare PLC

## Policy on Internal Code of Business Conduct and Ethics

### 1. Purpose

To establish a framework for ethical behavior and decision-making for all directors and employees of Printcare PLC, including policies on trading in the entity's securities.

### 2. Scope

This policy applies to all directors, officers, and employees of Printcare PLC.

### 3. Definitions

- **Business Conduct:** The manner in which Printcare PLC conducts its business operations, including interactions with stakeholders.
- **Ethics:** Moral principles that govern behavior and decision-making.
- **Insider Trading:** The buying or selling of the company's securities by someone who has access to material, non-public information about the company.

### 4. Core Values

- **Integrity:** Act with honesty and integrity in all business dealings.
- **Respect:** Treat all individuals with respect and dignity.
- **Responsibility:** Take responsibility for actions and decisions.
- **Transparency:** Promote open and honest communication.
- **Compliance:** Adhere to all applicable laws, regulations, and company policies.

### 5. Roles and Responsibilities

- **Board of Directors:** Provide oversight and ensure adherence to the code of conduct and ethics.

- **Senior Management:** Implement and enforce the code of conduct and ethics.
- **Compliance Officer:** Monitor compliance, provide guidance, and investigate violations.
- **Employees:** Understand and comply with the code of conduct and ethics.

## 6. Standards of Conduct

1. **Compliance with Laws and Regulations:** Adhere to all applicable laws, regulations, and internal policies.
2. **Conflicts of Interest:** Avoid conflicts of interest and disclose any potential conflicts to the Compliance Officer.
3. **Fair Dealing:** Conduct business fairly and honestly, and avoid unfair practices.
4. **Confidentiality:** Protect confidential information and do not disclose it unless authorized or legally required.
5. **Protection and Proper Use of Company Assets:** Use company assets responsibly and protect them from loss, theft, and misuse.
6. **Workplace Conduct:** Foster a respectful, safe, and inclusive workplace.

## 7. Insider Trading Policy

- **Material Non-Public Information:** Do not trade in the company's securities if you have access to material, non-public information.
- **Trading Windows:** Only trade in the company's securities during designated trading windows, as specified by the Compliance Officer.
- **Pre-Clearance:** Obtain pre-clearance from the Compliance Officer before trading in the company's securities.
- **Prohibited Transactions:** Avoid short sales, hedging transactions, and trading in derivative securities of the company.
- **Reporting Obligations:** Report all transactions in the company's securities to the Compliance Officer.

## 8. Reporting and Whistleblower Protection

- **Reporting Violations:** Report any violations of this code to the Compliance Officer or through the designated whistleblower hotline.
- **Protection Against Retaliation:** Protect employees who report violations in good faith from retaliation.

## 9. Compliance and Monitoring

- **Training and Awareness:** Provide regular training on the code of conduct and ethics.
- **Monitoring and Auditing:** Regularly monitor compliance and conduct audits as necessary.
- **Disciplinary Actions:** Take appropriate disciplinary action for violations of this code.

## 10. Review and Continuous Improvement

- **Policy Review:** The Board of Directors and senior management will review this policy annually or as needed to ensure its effectiveness and relevance.
- **Continuous Improvement:** Incorporate feedback and best practices to enhance the code of conduct and ethics.

## 11. Policy Approval and Review

This policy is approved by the Board of Directors and will be reviewed annually or as needed.