

## Jostens' Workplace Code of Conduct

- I. **Introduction.** Jostens, Inc.'s Workplace Code of Conduct (the "Code") describes the way the Company believes its business should be conducted. Jostens selects business partners who share our commitment to ethical standards and who comply with our Code. Jostens and Jostens' business partners' workplaces must adhere to all applicable laws. Jostens adheres to the following professional standards which affirm our commitment to principles and practices which are ethical and lawful, as well as good business.
- II. **Ethical Principles.** We acknowledge our corporate responsibilities to our customers and to the communities in which we do business. In order to effectively conduct business and protect our reputation, we strive to conduct our business in an ethical manner.
- III. **Environmental Compliance.** We expect our business partners to act responsibly in regards to the protection and preservation of the environment. Jostens and Jostens' business partners are dedicated to limit pollutants, seek less hazardous alternatives, promote recycling, conserve resources and promote environmental awareness among workers and suppliers.
- IV. **Workplace Standards.** These Workplace Standards apply to all factories that produce goods for Jostens. While Jostens recognizes that there are different legal and cultural environments in which factories operate throughout the world, these Workplace Standards set forth the basic minimum requirements all Jostens and Jostens' business partners' manufacturing facilities ("Facilities") must meet in order to do business with Jostens.
  - A. **Laws and Regulations.** Facilities shall comply with all laws and regulations in the jurisdictions in which they operate.
  - B. **Child Labor.** Facilities shall not employ workers younger than 15 years of age (or 14 where consistent with International Labor Organization guidelines, where the local law allows such exception) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15 or the minimum age established by law, whichever is greater.
  - C. **Involuntary Labor.** Facilities shall not use any form of involuntary labor, including forced labor, prison labor, bonded labor or indentured labor.
  - D. **Harassment or Abuse.** Facilities shall provide a work environment free of harassment. Facilities must treat all employees with respect and dignity. Thus, Facilities shall not subject employees to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Facilities shall not use monetary fines as a disciplinary practice.
  - E. **Wages and Benefits.** Facilities shall provide wages and benefits that comply with all applicable laws and regulations and match or exceed the prevailing industry wage.

- F. Working Hours.** Facilities shall ensure that workers' hours shall not exceed the lesser of (a) legal limitations on regular and overtime hours in the jurisdiction in which they manufacture or, on a regularly scheduled basis, (b) 48 hours per week plus 12 hours of overtime or (c) where the laws of the country of manufacture do not limit the hours of work, the regular work week plus twelve hours of overtime. In addition, except in extraordinary business circumstances, all employees shall be entitled to at least one day off in every seven-day period.
- G. Overtime Compensation.** In addition to their compensation for regular hours of work, Facilities' workers shall be compensated for overtime hours at such a rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their hourly compensation rate.
- H. Health and Safety.** Facilities shall comply with all applicable laws and regulations regarding the provision of a safe and healthy working environment. This includes dormitory facilities, if applicable.
- I. Nondiscrimination.** Facilities are dedicated to providing a working environment free of discrimination. No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, or termination, on the basis of their personal characteristics.
- J. Freedom of Association and Collective Bargaining.** Facilities shall comply with applicable law regarding the rights of workers to freedom of association and collective bargaining.
- K. Women's Rights.** Facilities shall ensure women workers receive equal treatment in all aspects of their employment. Pregnancy tests will not be a condition of employment and pregnancy testing, to the extent provided by Facilities, will be at the option of the worker. Employees will not be exposed to hazards that may endanger their reproductive health, and employees will not be forced to use contraception.
- L. Communication.** Facilities must post these Workplace Standards in all major workplaces, translated into the language(s) of the workers and supervisors.
- M. Subcontracting.** Facilities will not utilize subcontractors in the manufacturing of Jostens' products or components thereof without Jostens' written approval and only after the subcontractor has agreed to comply with the Workplace Code of Conduct, including these Workplace Standards.
- N. Monitoring and Compliance.** Facilities will maintain on site all documentation necessary to demonstrate compliance with these Workplace Standards. Jostens will undertake affirmative measures, such as announced and unannounced on-site inspections of production facilities, to monitor compliance with these Workplace Standards. Jostens' business partners must allow Jostens' representatives full access to production facilities, employee

records and employees for confidential interviews in connection with monitoring visits. In addition, Jostens' business partners must respond promptly to reasonable inquiries by Jostens' representatives concerning the operations of the Jostens' business partners' facilities.

Violation of these Workplace Standards will be appropriately remedied by Jostens' business partners at the cost of the Jostens' business partner. Failure to comply with these Workplace Standards may ultimately result in termination of the Jostens' business partner's contract.